

**In the Matter Of:**

**UNITED STATES vs STATE OF GEORGIA**

1:16-cv-03088-ELR

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**WHITNEY BRADDOCK**

*July 18, 2022*

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UNITED STATES vs STATE OF GEORGIA

July 18, 2022

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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CASE NO. 1:16-cv-03088-ELR

vs.

STATE OF GEORGIA,

Defendants.

VIDEOTAPED DEPOSITION OF

WHITNEY BRADDOCK

July 18, 2022 -- 9:16 a.m.

First RESA Office

201 W. Lee Street

Brooklet, Georgia

Deborah K. Lingonis, RPR, CCR 2883

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APPEARANCES OF COUNSEL

On behalf of the Plaintiff:

LAURA CASSIDY TAYLOE, ESQ.  
KELLY GARDNER, ESQ.  
US. DEPARTMENT OF JUSTICE  
Civil Rights Division  
950 Pennsylvania Avenue N.W.  
Washington, D.C. 20579  
202.598.9628  
laura.tayloe@usdoj.gov  
kellygardner@usdoj.gov

On behalf of the Defendant:

DANIELLE HERNANDEZ, ESQ.  
ROBBINS ALLOY BELINFANTE LITTLEFIELD  
500 14th Street, N.W.  
Atlanta, Georgia 30318  
404.856.3261  
dhernandez@robbinsfirm.com

On behalf of the Witness:

HIEU M. NGUYEN, ESQ.  
HARBEN HARTLEY & HAWKINS  
340 Jesse Jewell Parkway  
Wachovia Center, Suite 750  
Gainsville, Georgia 30501  
770.534.7341  
hnguyen@hhhlawyers.com  
drico@hhhlawyers.clom

The Videographer:

Tyler Tam  
Esquire Deposition Solutions

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Also Present :

Renee Wohlenhaus  
Amy McCart  
Melanie Johnson  
Stacey Suber-Drake  
Andrea Hamilton  
Allison Ewers  
Victoria Lill



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Deposition of WHITNEY BRADDOCK

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THE VIDEOGRAPHER: We are on the record at 9:16. Today's date is July 18, 2022. This is the beginning of Media 1 in the deposition of Whitney Braddock.

My name is Tyler Tam and I'm the videographer. The court reporter is Deborah Lingonis. Counsel, please state your appearance including who you represent beginning with the plaintiff's counsel.

MS. TAYLOE: Laura Tayloe for the Department of Justice.

MS. GARDNER: Kelly Gardner for the United States.

MS. HERNANDEZ: Daniel Hernandez for the State of Georgia.

MR. NGUYEN: Hue Nguyen on behalf of witness Ms. Braddock.

THE VIDEOGRAPHER: Will the court reporter please swear in the witness.

WHITNEY BRADDOCK,  
having been produced and first duly sworn as a witness,  
testified as follows:

EXAMINATION

BY MS. TAYLOE:

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1 Q. Good morning, Ms. Braddock. My name is Laura  
2 Tayloe. We've met briefly. I represent the United  
3 States in the United States versus Georgia, Civil  
4 Action 116 CV 03088.

5 I want to thank you for your time today. In  
6 person with you there is my colleague Kelly Gardner and  
7 some other of my colleagues are joining us by Zoom.

8 Could you please state your full name for the  
9 record.

10 A. Whitney Braddock.

11 Q. Okay. Am I correct that you're being  
12 represented by Mr. Nguyen, counsel for Cedarwood for  
13 purposes of today's deposition?

14 A. Yes, that's correct.

15 Q. Have you ever been deposed before?

16 A. No, I have not.

17 Q. Okay. I'm going to just outline a few  
18 guidelines before we start then. I'm going to -- the  
19 reporter has sworn you in so everything you say here  
20 today is under oath and must be truthful.

21 Do you understand?

22 A. Yes, I do.

23 Q. Right. And she's recording what you and I say  
24 so I'm going to ask you that you speak slowly and  
25 clearly including say yes or no instead of shaking your



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1 head or nodding or saying uh-huh.

2 Can you try to do that?

3 A. Yes.

4 Q. And another request that I know she's already  
5 stated for both of us especially since I'm remote and  
6 you're in person is if you will let me finish my  
7 question before you begin your answer and I will also  
8 let you finish your answer before I ask my next  
9 question.

10 Can we agree to that?

11 A. Yes.

12 Q. Okay. If you don't understand my question,  
13 feel free to let me know and I will try to clarify or  
14 rephrase it. Is that okay?

15 A. That is okay, yes.

16 Q. And later on if you remember something that  
17 would have been responsive to an earlier question, feel  
18 free to supplement. You can just let me know you  
19 remembered something or you want to clarify something,  
20 and that's no problem. You can just say that when it  
21 comes to your mind. Okay?

22 A. Okay.

23 Q. We will have occasional breaks. They'll  
24 probably follow when we finish one line of questioning,  
25 we'll take a break along the way.

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1 But if you need a break in between, just let  
2 me or your counsel know, and we can try to work around  
3 that. My only request would be if there's a question  
4 pending, you answer that question first and then we can  
5 see about taking a break. Okay?

6 A. Okay.

7 Q. Okay. Is there any reason you can think of,  
8 any medication or disability, that would make -- any  
9 reason that you wouldn't be able to understand the  
10 question and answer completely and truthfully today?

11 A. No.

12 Q. Okay. Then I'm going to do our first  
13 document. This is the one we practiced on. So I'm  
14 going to give you control and ask you do you recognize  
15 this document?

16 A. Yes.

17 Q. Okay. And is this the subpoena to testify in  
18 a deposition in a civil action that you received?

19 A. Yes.

20 Q. And can you confirm that your appearance today  
21 is pursuant to the subpoena?

22 A. Yes.

23 Q. Do you understand that this deposition is  
24 being taken in connection with the litigation that I  
25 mentioned before against the State of Georgia relating

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1 to the Georgia Network for Educational and Therapeutic  
2 Support Program?

3 A. Yes.

4 Q. And are you familiar with that term being  
5 referred to as the GNETS program?

6 A. Yes.

7 Q. When did you first learn of this litigation?

8 MR. NGUYEN: I'm going to object to the extent  
9 that the question asks to elicit information protected  
10 by attorney-client privilege.

11 You can answer the question as to when you  
12 were informed, but do not discuss the contents of what  
13 you discussed with the attorneys for the GNETS program  
14 and the RESA. That would include myself or any  
15 attorney in our office, Beth Morris, Reagan Sauls. You  
16 may otherwise answer the question.

17 THE WITNESS: Could you repeat the question?

18 MS. TAYLOE: Okay. I couldn't hear his  
19 objection. Is he basically saying not to disclose any  
20 discussions with counsel during the course of the  
21 answer?

22 A. Yes.

23 Q. Okay. Yeah, the question was when did you  
24 first learn of this litigation?

25 A. I am not completely certain when.

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1 Q. Can you give an estimate?

2 A. I'm going to guess it was about nine years  
3 ago, but I'm not completely certain. I mean, I've  
4 worked with Cedarwood for 35 years, so it would have  
5 come up at some point in time.

6 Q. Okay. Do you remember how you learned of the  
7 litigation?

8 A. I don't recall.

9 Q. What is your understanding of the nature of  
10 the lawsuit?

11 A. That children and GNETS are being secluded and  
12 that the State of Georgia is said to be doing that,  
13 running the GNETS.

14 Q. And again without asking you to disclose any  
15 conversations with counsel, did you do anything to  
16 prepare for today's deposition?

17 A. No.

18 Q. You didn't meet with anybody?

19 A. I met with counsel and that's it.

20 Q. Okay. For how long?

21 A. We met for a little over an hour.

22 Q. And when was that?

23 A. Thursday or Friday.

24 Q. Did you meet with anybody other than  
25 counsel?

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1 A. No.

2 Q. Did you review any documents in preparation  
3 for the deposition?

4 A. No.

5 Q. Okay. And have you read any deposition  
6 transcripts or notes from other depositions?

7 A. No.

8 Q. So belatedly I want to thank you and  
9 Cedarwood. I imagine you had a big part in it for your  
10 organized production of documents in response to our  
11 subpoena for documents. It was very well organized and  
12 helpful for me to understand better so I can ask  
13 questions in a more systematic way. So thank you for  
14 that.

15 The documents you produced did not have unique  
16 identifiers stamped on them, so I'm going to  
17 occasionally refer to them by the numbers that we  
18 stamped on them when we got them just to have an  
19 internal tracking system.

20 When I share a document with you to review it,  
21 it won't have that number visible because I'm sharing  
22 it as your organization produced it to us. Okay?

23 Does that make sense?

24 A. Yes.

25 Q. Okay. So next up I just want to go over some

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1 abbreviations. We use a lot of abbreviations in our  
2 business, and I want to make sure we have the same  
3 understanding on some of them and have on the record  
4 what we mean about by them.

5 So we just talked about GNETS. You'll  
6 understand that means the Georgia Network for  
7 Educational and Therapeutic Support, correct?

8 A. Correct.

9 Q. And if I say D-O-E or GDOE or the Department  
10 of Education, you'll understand I mean the Georgia  
11 Department of Education?

12 A. Yes.

13 Q. LEA is Local Educational Agency?

14 A. Yes.

15 Q. And RESA is Regional Education Service Agency?

16 A. Yes.

17 Q. And if I talk about DBHDD, you'll understand  
18 that means the Department of Behavioral Health and  
19 Developmental Disabilities. You understand that?

20 A. Yes.

21 Q. And then there are a few acronyms or  
22 abbreviations that I would like you to let me know how  
23 you understand them and what they mean to you.

24 So the first one will be FBA. What's an FBA?

25 A. Functional Behavior Assessment.

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1 Q. And what is that?

2 A. It is a process to look at behavior to  
3 determine the function of behavior in order to better  
4 deal with that behavior.

5 Q. Okay. And BIP?

6 A. Behavior Intervention Plan.

7 Q. What's that?

8 A. It is a part of the student's IEP that  
9 addresses the behaviors that are found in FBA.

10 Q. Okay. And I guess we should throw in IEP.

11 A. Individual Education Plan or program.

12 Q. And what is that?

13 A. Each student in special education has an IEP,  
14 and the IEP directly relates to the individual  
15 student's plan for their education.

16 Q. Okay. How about LRE?

17 A. Least Restrictive Environment.

18 Q. And what's that?

19 A. It is the least restrictive environment that  
20 the student can best function in having to do with  
21 special ed program or the school's -- or not special ed  
22 programs, just the way that a student would be  
23 served.

24 Q. And EBD?

25 A. Emotional Behavior Disorders.

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1 Q. And what's that?

2 A. It is an indication of a student's eligibility  
3 and the way that they would then be served.

4 Q. And by eligibility, eligibility for what?

5 A. Eligibility for special education services.

6 Q. Okay. So, I'm sorry, just to be clear, that  
7 doesn't mean you have to have an EBD diagnosis to be  
8 eligible. It's just one form of eligibility for  
9 special education services?

10 A. Yes.

11 Q. Okay. I think that will help us understand --  
12 make sure we understand each other correctly, but if I  
13 use a term incorrectly or if it's confusing, feel free  
14 to either ask for clarifications or correct me to make  
15 sure we're meaning the same thing.

16 We'll turn now to your professional  
17 background. Can you tell me your educational  
18 background after high school, please, what degrees you  
19 earned from where and when.

20 A. I earned a sociology degree with an emphasis  
21 in social work from Georgia Southern University that  
22 was just Georgia Southern College at that time.

23 And then I earned a master's degree in  
24 behavior disorders from Armstrong State College. And  
25 then I earned a specialist degree in education



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1 leadership from Walden University.

2 Q. And what is a specialist degree?

3 A. It is the step between master's degree and  
4 Ed.D, a doctorate.

5 Q. Okay. Do you have any other relevant  
6 certifications or licenses --

7 A. No.

8 Q. -- beyond described? Okay.

9 Okay. I am going to share another document.  
10 I'm sorry the first one I introduced I should have  
11 asked to be marked as Exhibit 1. The deposition notice  
12 will be Exhibit 248.

13 (Plaintiff Exhibit 248 marked.)

14 BY MS. TAYLOE:

15 Q. And the one I'm doing now will be  
16 Exhibit No. 249. I'm sorry I didn't do that earlier.

17 (Plaintiff Exhibit 249 marked.)

18 BY MS. TAYLOE:

19 Q. So you should be able to see now and have  
20 control of Exhibit 249.

21 A. Yes.

22 Q. Okay. I understand that this document has not  
23 been updated recently. Thank you for providing it. Is  
24 everything generally still accurate?

25 A. Yes, it is.

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1 Q. Okay. And can you state for the record what  
2 this document is?

3 A. This document is a copy of my resume.

4 Q. Okay. Is your title still Regional Director  
5 of Cedarwood GNETS?

6 A. Yes, it is.

7 Q. And who is your employer?

8 A. My employer is First District RESA. They are  
9 the fiscal agent for Cedarwood. So I consider myself  
10 employed by Cedarwood GNETS, but when it comes down to  
11 it, the person that writes my check is First District  
12 RESA.

13 Q. Okay. Thank you. Okay. And you started your  
14 teaching career at Cedarwood in 1987; is that correct?

15 A. That's correct.

16 Q. At which site?

17 A. The Collins site is no longer in service.

18 Q. When did that stop being in service?

19 A. I don't recall.

20 Q. Okay. I don't need the dates. I'm just  
21 trying to figure out -- so were you still teaching  
22 there when it stopped being in service?

23 A. Yes.

24 Q. Okay. Where did you go then?

25 A. That site then was moved to a site in

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1 Reidsville, Georgia.

2 Q. And is that one still in service?

3 A. No.

4 Q. Okay. Where did you go after Reidsville?

5 A. After Reidsville I went to Jesup, Georgia.

6 Q. And is that site still in service?

7 A. No.

8 Q. And then where did you go after that?

9 A. After Jesup I went to Claxton, Georgia.

10 Q. And is that site still in service?

11 A. No.

12 Q. Where did you go after that?

13 A. Statesboro, Georgia.

14 Q. Statesboro. Okay. And during all that time  
15 were you a teacher?

16 A. I began as a teacher and then I was a school  
17 liaison. Then I was a coordinator and then I was a  
18 director.

19 Q. Okay. So I see in your resume that you  
20 started being a liaison in 1985. Which facility were  
21 you at when that started?

22 A. I would have been at the Reidsville site.

23 Q. Reidsville. I'll back up for a second. When  
24 you were still a teacher, what did you teach?

25 A. I taught an elementary class and then I

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1 changed to middle school.

2 Q. And did you teach in a certain content area or  
3 was it just middle school?

4 A. Just middle school.

5 Q. And did you have a teaching license or  
6 certification at the time?

7 A. Yes.

8 Q. What was that in?

9 A. Behavior disorders.

10 Q. Is that -- I know your degree was in social  
11 work. How was it -- can you explain the difference  
12 between social work and behavior disorders?

13 A. When I got a job at Cedarwood as a teacher, I  
14 went back to school and got my master's degree in  
15 behavior disorders. And prior to that, I had a  
16 provisional certification.

17 Q. Can you describe what a provisional  
18 certification means?

19 A. It's a provision to getting a regular  
20 certification so that based on having a college degree  
21 then you can go ahead and teach. I believe that it was  
22 due to a need for teachers in that area.

23 Q. Okay. So when you started, you had a degree  
24 in social work but not a teaching credential, but you  
25 earned it as you were working at Cedarwood?

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1 A. Yes.

2 Q. Okay. And then you said starting in your  
3 liaison position you were at Reidsville. What was the  
4 liaison -- what did the liaison job entail?

5 A. I worked with teachers at the LEAs and helping  
6 students to move back into those less restrictive  
7 environments. I worked with teachers on dealing with  
8 problems with students.

9 I did intakes for the students when they were  
10 referred to our program to get all the information. I  
11 worked with the teachers at the Cedarwood site with  
12 teaching.

13 Q. Is that position still called liaison or is  
14 there another position?

15 A. It is. It's now called -- consultant teacher,  
16 I'm sorry.

17 Q. All right. Then you started being a program  
18 coordinator starting in 1998; is that correct?

19 A. Yes.

20 Q. Which site would you have been when you  
21 started that position?

22 A. I started that position at the Jesup site.

23 Q. And could you describe your responsibilities  
24 in that role?

25 A. I had responsibility for the program at the

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1 Jesup site, making sure that teachers were covering  
2 classes. I was the supervisor at that site.

3 Q. And then you've been in your current position  
4 since 2014; is that right?

5 A. Yes.

6 Q. Okay. And so do I understand correctly that's  
7 over both campuses?

8 A. That's correct, yes.

9 Q. And by both campuses now since you mentioned a  
10 number, could you please state what the two campuses  
11 are still in service.

12 A. The Statesboro site and the Lyons site.

13 Q. And where's your office?

14 A. My office is at the Statesboro site.

15 Q. How do you divide your time between the  
16 Statesboro and Lyons sites?

17 A. I will visit both sites. As the regional  
18 director, my office is not in the same building as the  
19 school and where the students are. I will visit and do  
20 walk-throughs. I will travel to the Lyons site.

21 Prior to COVID, I was going generally once a  
22 week. After COVID and not wanting to spread or  
23 transfer possible COVID germs, it was a little less  
24 than that. I meet with the coordinator regularly  
25 either through a Google meet or just through phone

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1 calls.

2 Q. Okay. And so aside from visiting the sites,  
3 what are your responsibilities as regional director?

4 A. I do budgeting and I handle requisitions,  
5 approve that, make sure everyone has what they need to  
6 have. I work with the special ed directors.

7 I do hiring. I work and make sure for  
8 certification. I handle reports and I deal directly  
9 with the Georgia Department of Education person that's  
10 assigned to GNETS.

11 Q. Anything else you can think of?

12 A. That's about it. I mean, I do -- I kind of do  
13 whatever comes up that needs to be done.

14 Q. I get it. So a few follow-ups on that. You  
15 said you work with the special ed directors. Does that  
16 mean the special ed directors for each participating  
17 LEA?

18 A. Yes.

19 Q. And when you refer to the Georgia Department  
20 of Education assigned to GNETS, who is that?

21 A. Vicky Cleveland.

22 Q. And have you worked with other people in that  
23 position before her?

24 A. Yes. Nakeba Rhaming and Sandy Demuth.

25 Q. And what kinds of things have you worked with

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1 those three people in regards to?

2 A. They send out schedules for when we should do  
3 things. If I have questions about something that's  
4 going on or in the budget, they send us our budget. I  
5 may send them reports that they request. I don't have  
6 a lot of contact with them.

7 Q. Thank you. That's helpful background. We may  
8 dive into some more of those topics in detail as we go  
9 through, but that's a very good overview. Thank you.

10 I think we're done with the resume. Do you  
11 think your responsibilities in your current position  
12 are fairly captured in the resume now?

13 MR. NGUYEN: Take your time and go through it.  
14 Okay?

15 Laura, I was just telling her to take her time  
16 to go through the list --

17 MS. TAYLOE: Thank you.

18 MR. NGUYEN: -- in case you didn't hear what I  
19 said.

20 (Witness reviewing document.)

21 THE WITNESS: Yes, I do.

22 BY MS. TAYLOE:

23 Q. Okay. Do you think there are any categories  
24 of job responsibilities that are not reflected on this  
25 document?



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1 (Witness reviewing document.)

2 THE WITNESS: Not that I can think of.

3 BY MS. TAYLOE:

4 Q. Okay. Thank you. Okay. To whom do you  
5 report?

6 A. I report to Richard Smith at First District  
7 RESA.

8 Q. And what is his position at the RESA?

9 A. He's the executive director.

10 Q. And is he the one who performs your  
11 evaluation?

12 A. Yes.

13 Q. Does anybody else do an evaluation of you, of  
14 your work?

15 A. No.

16 Q. Okay. And do you have anybody who reports to  
17 you?

18 A. The coordinators of each staff report to me,  
19 and I have a program evaluator that reports to me.

20 Q. And what does the program evaluator do?

21 A. She handles the -- she does payroll, makes  
22 sure that that's correct. She handles the  
23 requisitions, puts them into our system, our PO system.  
24 She is in charge of making sure that purchased items  
25 are in our inventory system.

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1 She handles the filings for staff, and she  
2 handles -- she keeps and files student files that are  
3 no longer at either site.

4 Q. Where are student files -- so students that  
5 are still in the program, their files are at each  
6 site?

7 A. Correct.

8 Q. She keeps the ones after the students have  
9 transitioned out or withdrawn or whatever?

10 A. Yes.

11 Q. I understood everything except you mentioned  
12 requisitions and PO system. Can you explain what that  
13 means.

14 A. So when staff -- or at each site if they need  
15 items to be purchased, they let me know. I then will  
16 approve them. I send them to Tara Hendrix, the program  
17 evaluator. She enters them into a purchase order  
18 system.

19 And then at RESA here there is a person in  
20 charge of purchasing, and he does the ordering. And  
21 then she also handles the billing for that and making  
22 sure that those bills get paid.

23 Q. So the PO system is run by the RESA?

24 A. Yes.

25 Q. And are there certain purchases that need to

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1 be approved even above the RESA?

2 A. Well, they would be depending on like how much  
3 they would be, and then some things need to have  
4 approval through the Georgia DOE.

5 Q. What kinds of things are those?

6 A. There's a price point that would have to be  
7 approved. I couldn't -- I don't know. I can't report  
8 to what it is.

9 Q. Okay. But it has more to do with how much it  
10 costs than what kind of purchases?

11 A. I believe, yes.

12 Q. Okay. And you said you had interactions with  
13 the special education directors of each LEA. Is there  
14 anybody else -- well, let's start with them.

15 What kinds of interactions -- what kinds of  
16 communications do you have with those special education  
17 directors?

18 A. We meet monthly through what used to be  
19 Southeast GLRS. I think they're still our Southeast  
20 GLRS, but it's a District 14 group meeting.

21 And, I mean, we talk about students, problems  
22 that they may have, their needs that they have that  
23 they may need us to work with for them. We talk about  
24 IEPs, and if I need to attend a meeting. We may talk  
25 about money if we need them to supplement anything.

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1 Q. We talked about the Southeast GLRS. Can you  
2 say what that is, please.

3 A. Georgia Learning Resources Service, I  
4 believe.

5 Q. And what does that organization do?

6 A. They work with special education. They do  
7 training. They bring down things from the Georgia  
8 Department of Education that special ed directors need  
9 to know to do to be compliant.

10 Q. Is that connected with the RESA or is that a  
11 separate entity?

12 A. They are also under the RESA, yes.

13 Q. And you said you meet with the special ed  
14 directors monthly. Do you meet with them individually  
15 as well or is it always the group meetings you were  
16 describing?

17 A. Just whatever is needed. If they needed to  
18 meet with me, I would meet with them at any time.

19 Q. Okay. We talked about your interactions with  
20 the GNETS program. Well, I shouldn't say that. Do you  
21 know the title, Vicky Cleveland's title?

22 A. I think it's program specialist.

23 Q. And so we talked about your interactions with  
24 her and people in that position. Do you deal with  
25 anybody else at Georgia Department of Education?

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1 A. Not usually. The State Department of  
2 Education Special Ed Director when allowed. I suppose  
3 I could work with her some but generally do not.

4 Q. So you work with her sometimes. What kinds of  
5 things have you come into contact with her about?

6 A. I really can't think of anything recently that  
7 I have. She sends out an email blast every Friday with  
8 things about special education, general things that we  
9 may need to know.

10 I have very, very few dealings with. She  
11 speaks at things like some of the conferences. And  
12 that would be really it.

13 Q. Okay. Have you had any interactions with the  
14 Georgia Department of Education Facilities  
15 Department?

16 A. Not recently, but in the past, yes.

17 Q. What were those about?

18 A. Well, at one point in time all of the  
19 facilities were evaluated by them. And then some of  
20 the facilities were closed, and then some of the  
21 facilities have been updated.

22 Q. So was that partly -- well, you mentioned  
23 before a number of facilities that were no longer in  
24 service. And I'm curious how that interaction, what  
25 you just said, some of them being closed. Can you

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1 match up what the role of those were in any of those  
2 facilities?

3 A. Some of the closures didn't have anything to  
4 do with that. When we had a site in Baxley, that I  
5 didn't speak of because I've not ever worked there, but  
6 that one was closed because it was in poor repair.

7 And then the site in Claxton was closed, and  
8 that's when Bulloch County Schools -- no, it wasn't,  
9 I'm sorry. That's not -- we just moved from the site  
10 in Claxton to Bulloch schools because it was a better  
11 building.

12 Our site in Lyons was closed, and then we  
13 moved to a different site in Lyons that was a much  
14 better building. We have closed sites and kind of  
15 changed where students went or what different systems  
16 were served at different places just based on student  
17 numbers.

18 Q. You said the Baxley site was closed because it  
19 was in poor repair. Who decided to close it because it  
20 was in poor repair?

21 A. I believe it was the Georgia Department of  
22 Education Facilities.

23 Q. And what about the other ones that you said  
24 were closed?

25 A. When the Baxley site closed, those students

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1 then were moved to -- we changed their service to our  
2 Lyons site.

3 Q. And you said that one was closed. Who decided  
4 to close that one?

5 A. Same. It was under -- it was at the same  
6 time.

7 Q. So that was also by the Department of  
8 Education?

9 A. Yes.

10 Q. And you mentioned another one, Claxton. But  
11 Claxton wasn't closed. You said you just moved to a  
12 different venue?

13 A. Yes, uh-huh.

14 Q. Okay. What about the Jesup site?

15 A. The Jesup site was closed just due to a  
16 reduction in the number of students that we were  
17 serving, and so these students then were being served  
18 at the Baxley site.

19 Q. And Reidsville?

20 A. Reidsville was just moved to the Claxton site.  
21 I don't know why.

22 Q. Okay. And then they moved from there to other  
23 schools?

24 A. Yes.

25 Q. Okay. Thank you for all those pieces. And

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1 then are there any other state agencies? We talked  
2 about Georgia Department of Education. Do you have any  
3 interactions with anybody from DBHDD?

4 A. There has been a person at DBHDD that has  
5 spoken at GNETS directors meetings in the past. I  
6 couldn't tell you what their name was.

7 Q. And what kinds of things did this person speak  
8 about?

9 A. They were speaking just on the  
10 responsibilities and the services provided by DBHDD.

11 Q. And would these include mental health  
12 therapeutic services?

13 A. Yes.

14 Q. Do they support GNETS in terms of helping  
15 students have access to mental health and therapeutic  
16 services?

17 A. We have students that use some of their  
18 services, yes.

19 Q. How does that come about?

20 A. It's usually through their parent using their  
21 services.

22 Q. So a patient uses the service or the parents  
23 access the service?

24 A. The parents access the services.

25 Q. Right. And how about the Department of



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1 Community Health. Do you have any interactions with  
2 anybody from that department?

3 A. No.

4 Q. Okay. So we talked a little bit about the  
5 meetings with the regional directors. Well, I'm not  
6 sure we did actually. I might be mixing up my  
7 meetings.

8 Do you participate in regular meetings with  
9 regional directors of GNETS program?

10 A. Yes.

11 Q. How often do you have those meetings?

12 A. We have those meetings anywhere from once a  
13 month to four times a year.

14 Q. How are they organized? Who decides when  
15 there's going to be a meeting or how often?

16 A. They are organized through Georgia Department  
17 of Education.

18 Q. Thank you. Does Georgia Department of  
19 Education personnel attend these meetings as well?

20 A. Yes.

21 Q. And who -- is it the people we talked about,  
22 Vicky Cleveland and her predecessors or other people?

23 A. Vicky Cleveland, yes, and her predecessors.

24 Q. Anybody else?

25 A. They may bring in other Georgia DOE personnel

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1 to do professional learning during these meetings.

2 Q. And what is discussed at these kinds of  
3 meetings? What kinds of topics do you talk about when  
4 you meet with the other directors?

5 A. In the past, we have had someone like from the  
6 Georgia Department of Education Math Department talk  
7 about math curriculum and things that could help  
8 special ed students through math curriculum.

9 We kind of just talk about deadlines, making  
10 sure that we've got our budget in on time, and that  
11 kind of thing.

12 Q. So is it more of a somebody presents at each  
13 meeting or is it a round-table conversation or some  
14 mix?

15 A. In the past we would get together and have  
16 meetings. There were times when different directors  
17 might present or there were other guests that would  
18 present. But most recently after COVID, most of our  
19 meetings are virtual and last about an hour at tops.

20 Q. So if I understand when you say the virtual  
21 ones, what are they like? Are they more of a  
22 presentation or more of a conversation?

23 A. More of a presentation.

24 Q. And is there an agenda? Does somebody  
25 announce who the guest is going to be and what the

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1 topic will be in advance?

2 A. Yes.

3 Q. And is that shared with you in advance?

4 A. No, I don't think so. I think we get it when  
5 we then sign in.

6 Q. Okay. And is the invitation, does that come  
7 from the Department of Education?

8 A. Yes.

9 Q. Do you have input into what the topics would  
10 be? Like, if there was something you were concerned  
11 about or struggling with, would you be able to ask if  
12 that will be a topic at one of these meetings?

13 A. Yes.

14 Q. And how would you do that?

15 A. A lot of times a survey is sent out to the  
16 directors with, you know, did you need information on  
17 this, that, or the other. And so you can fill out that  
18 survey and it's sent back and those questions then can  
19 be addressed.

20 Q. And who sends out that survey?

21 A. Vicky or some other person at the DOE that she  
22 may have send it out.

23 Q. Have you ever been asked to prepare reports  
24 for anyone in the governor staff or the state  
25 legislature?

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1 A. No.

2 Q. Okay. And the reason I ask about this is we  
3 understand a lot of the funding comes from the  
4 legislature, so we're wondering if you have any  
5 participation in that process?

6 A. No.

7 Q. Okay. Now, we started covering this already.  
8 We already talked about how there's two, given the  
9 number of facilities that we mentioned before, there's  
10 two programs now or two sites now, the Statesboro and  
11 Lyons programs.

12 I just want to go over a little bit about the  
13 structure of the Cedarwood program. So can you tell me  
14 which counties are served by the Statesboro site?

15 A. Statesboro serves Bulloch County, Evans  
16 County, and Jenkins County.

17 Q. Okay. And which counties are served or which  
18 jurisdictions, I should say, are served by Lyons.

19 A. Appling County, Candler County, Jeff Davis  
20 County, Tattnall County, Vidalia city schools, and  
21 Toombs County schools.

22 Q. Did any other counties previously participate  
23 that no longer do?

24 A. Wayne County was a part of Cedarwood, but they  
25 are actually now a part of Coastal Academy.

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1 Q. And do you know why they switched?

2 A. They switched because Coastal Academy's  
3 location in Hinesville was closer than the Cedarwood  
4 location in Lyons.

5 Q. So is that when the Jesup site closed they  
6 moved because the Jesup site had been closer but now  
7 the Coastal Academy was closer?

8 A. Okay. When the Baxley site shut down, Wayne  
9 County pulled their students in to serve them at their  
10 own schools, and Cedarwood was working with them with  
11 their students in their schools.

12 So they were school-based. And then they did  
13 that for two years and then made the decision then to  
14 move their students to the Hinesville side of Coastal  
15 Academy.

16 Q. Okay. So Cedarwood was working with them in  
17 the setting for two years and then the county decided  
18 to move those students into the Coastal Academy site?

19 A. Correct.

20 Q. Okay. When students are accepted into the  
21 Cedarwood program, are they assigned to Statesboro or  
22 Lyons strictly by geography or is there some other  
23 factor?

24 A. Strictly by geography.

25 Q. So it's whatever county their home school is

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1 determines which site they go to?

2 A. Yes.

3 Q. And then within a site how are they assigned  
4 to classrooms?

5 A. Generally by their grade level.

6 Q. It sounds like there's some times when it's  
7 not by grade level. When is it not by grade level?

8 A. Well, it would depend on if they had different  
9 needs or weren't able to be successful in with a  
10 grade-level group and they needed to be with a  
11 different group.

12 Q. When you say grade-level group, what is the  
13 range of grades within classes?

14 A. We have elementary classes, middle school  
15 classes, high school classes. We might include middle  
16 school and high school students together. There's some  
17 middle school students that might be in an elementary  
18 class.

19 Q. So when you say elementary school classes,  
20 does that mean a class might have students from  
21 kindergarten through fifth grade in it?

22 A. Yes.

23 Q. And the same for middle school. It might have  
24 sixth through eighth grade?

25 A. Yes.

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1 Q. And high school ninth through twelfth?

2 A. Yes.

3 Q. And some middle school students might be in  
4 elementary school classes. In some of those cases you  
5 could have students from kindergarten to eighth grade  
6 in the same class?

7 A. More would be kindergarten through sixth  
8 grade. Possibly seventh grade if a student was very  
9 immature.

10 Q. And how many students are there generally in  
11 each class? What's the --

12 A. Six to ten in general.

13 Q. And does each class have a teacher and a  
14 paraprofessional?

15 A. Yes.

16 Q. Okay. We're going to come back to staffing.  
17 I just want to get an overview. Do parents have an  
18 option to choose between locations or classrooms based  
19 on the children's need?

20 A. No.

21 Q. The last bit about -- Jenkins County joined  
22 Cedarwood after you became director?

23 A. Yes.

24 Q. Do you know why they switched from where they  
25 were before?

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1           A.     The distance that their students would have to  
2 travel and be bussed, it was shorter to come to  
3 Statesboro than to where that was. And I believe that  
4 that was due to some restructuring in the GNETS program  
5 that they were part of.

6           Q.     So when they decided to change, what was the  
7 process that had to happen?

8           A.     Well, it began with First District RESA and  
9 finding out from our Board of Control and Bulloch  
10 County if that was okay for them to move into our area.  
11 And then there was some reports that had to be  
12 completed for the Georgia Department of Education.

13          Q.     Okay. So they basically notified RESA that  
14 they wanted to switch, is that right, or you?

15          A.     The special ed director who I knew -- I know  
16 came to me and asked if it was something that could be  
17 done because she at that time, I believe, had two  
18 students that were served by GNETS.

19                 And I said yes, it should be. I need to get  
20 approval, and then I asked the Georgia DOE what needed  
21 to be done, and there was a form that needed to be  
22 completed for -- I don't know who approved that.

23          Q.     Okay. And did it matter what the number of  
24 students were? I mean, did you have to evaluate  
25 capacity or was it just a logistical getting paperwork



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1 done to switch between programs?

2 A. Both.

3 Q. How was that evaluated?

4 A. Well, I wanted to -- I didn't want to --  
5 Jenkins County has never had very many students ever  
6 served. They're a very small county, and so I didn't  
7 want to overload the Bulloch site and the Statesboro  
8 site. So that was just part of it.

9 Q. And then you said you needed to fill out a  
10 form for them. Did they need to approve the  
11 transfer?

12 A. I don't know if they had to approve it or they  
13 just wanted the paperwork. I truly don't know.

14 Q. Do you remember there being a question for a  
15 while about whether you were getting the funding for  
16 the Jenkins students?

17 A. Yes.

18 Q. And there was some delay in when that was  
19 processed?

20 A. Yes.

21 Q. Do you think that was the -- well, I'm going  
22 to introduce as an exhibit.

23 MR. NGUYEN: Laura, we've been going over an  
24 hour. Whenever is a convenient time -- no rush -- but  
25 whenever is convenient, can we do a break?

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1 MS. TAYLOE: Okay. Let me just pull up this  
2 exhibit because it's related to what we were just  
3 talking about.

4 MR. NGUYEN: No rush at all. I just, you  
5 know, could use a restroom break.

6 THE WITNESS: And my knees won't work in a  
7 little while if I remain seated.

8 BY MS. TAYLOE:

9 Q. Sorry, I'm having trouble moving this  
10 document.

11 (Plaintiff Exhibit 250 marked.)

12 MS. TAYLOE: I'd like to introduce  
13 Exhibit No. 250. It is identified GA00317244.

14 THE REPORTER: Exhibit 250. Thank you.

15 BY MS. TAYLOE:

16 Q. Do you recognize this document?

17 A. Yes, I do.

18 Q. Okay. Can you describe -- now that we've been  
19 talking about it, does this help you remember the  
20 process?

21 A. Yes, a little bit. Is there more to it than  
22 the first part? I'm having a little trouble scrolling  
23 it down. Now that's it. Okay. Yeah, it does help me  
24 remember it a little bit.

25 Q. What do you remember?

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1 A. That -- well, I was just asking if I was given  
2 the credit for their numbers in my budget.

3 Q. So that was after the students had been there.  
4 But before you make reference to it, it says, "Jenkins  
5 County got permission to move from RiverQuest to  
6 Cedarwood last year by Nakeba."

7 I assume there Nakeba is Nakeba Rhaming?

8 A. Yes.

9 Q. So does that lead you to believe that you  
10 thought at the time that Nakeba gave information for  
11 RiverQuest -- I'm sorry -- from Jenkins County to move  
12 from RiverQuest to Cedarwood?

13 A. Yes.

14 Q. You don't remember anything more about how  
15 that came to be?

16 A. What I remember is that this was prior to a  
17 form that needed to be completed and Nakeba just gave  
18 permission for that change. And then a form was sent  
19 to me, and we had to complete that form and send it  
20 back in to Vicky Cleveland.

21 Q. Okay. Because Nakeba had left by then and  
22 Vicky was now in that position?

23 A. Yes.

24 Q. Okay. If y'all want to take a break now, I  
25 think that's a good stopping point then.

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1 THE VIDEOGRAPHER: We are off the record at  
2 10:23.

3 (Recess.)

4 THE VIDEOGRAPHER: We are back on the record  
5 at 10:40.

6 BY MS. TAYLOE:

7 Q. Okay. I had a few follow-ups after looking  
8 over my notes during the break. Were you certified in  
9 special education at any point during your tenure at  
10 GNETS?

11 A. Yes. I had certification at EBD.

12 Q. And at what point did you do that?

13 A. Excuse me?

14 Q. At what point in your time working at GNETS  
15 did you get that?

16 A. I think it took two years to finish the  
17 master's program.

18 Q. And is that a therapeutic certification or  
19 educational certification?

20 A. Educational.

21 Q. Okay. And as part of your responsibilities as  
22 director, are you responsible for overseeing the  
23 quality of therapeutic services?

24 A. Yes.

25 Q. And responsible for overseeing the quality

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1 educational instruction?

2 A. Yes.

3 Q. And then the last follow-up from before, you  
4 mentioned before that some facilities were moved to go  
5 to better sites. Can you tell us in your mind, or in  
6 the minds of the people who made the decision, made the  
7 new sites better?

8 A. I really don't know.

9 Q. So one is since you said it was to fit the  
10 size of the student population. The population was  
11 decreasing so you were too small of a facility. In  
12 other words, you said it was a better building.

13 Do you remember why it was better?

14 A. I don't recall.

15 Q. Okay. All right. Then let's talk a little  
16 bit more about structure. So for each county served,  
17 do you have a memorandum of agreement with each county  
18 or how does it work that placements are made in  
19 Cedarwood?

20 A. I don't know of an MOU that we have with the  
21 counties for that, but placements are made at Cedarwood  
22 via the IEP committee.

23 Q. Okay. I'm thinking more about just the  
24 relationships between the entities, not the process for  
25 the students. Do you have an MOU with Bulloch

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1 County?

2 A. I don't know.

3 Q. Okay. Do you have an MOU with the RESA?

4 A. I don't know that either.

5 Q. So you said the RESA services the fiscal agent  
6 and that you report to the executive director at the  
7 RESA. What does that look like in terms of your daily  
8 interaction or weekly or monthly interaction with the  
9 executive director of RESA?

10 A. I contact him if I need him, and he contacts  
11 me if he needs something that he has gotten a report  
12 from a superintendent that we need to talk about. I  
13 participate in the RESA leadership team meetings.

14 Q. What's that?

15 A. They have monthly leadership team meetings  
16 that as long as I don't have a conflict, I participate  
17 in.

18 Q. So is that with other GNETS directors or other  
19 leadership?

20 A. It's other leadership at the RESA.

21 Q. Okay. Who would that consist of?

22 A. The director of Southeast GLRS. The director  
23 of Coastal GLRS. The finance director. The person in  
24 charge of Georgia TAPP. The purchasing director. And  
25 then some of the folks that are in charge of the

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1 different consultants that are housed that go through  
2 RESA.

3 Q. What's Georgia TAPP?

4 A. It is a program to train teachers similar to  
5 myself who had a degree in something else and is coming  
6 in to education without having an education degree.

7 Q. And you said folks in charge of different  
8 consultants that go through the RESA. Can you explain  
9 what that means?

10 A. RESA has math consultants. They have ELA and  
11 reading consultants. They have -- I don't remember the  
12 name of it, but it's some of their consultants run  
13 through different grants. Reading First maybe.

14 Q. So these would be educational service  
15 providers that have a grant or have a contract with the  
16 RESA and the RESA arranges for them to provide services  
17 at Cedarwood?

18 A. No, not at Cedarwood.

19 Q. But they come to the leadership team  
20 meetings?

21 A. Correct, the RESA leadership team meetings.

22 Q. But they don't provide services at  
23 Cedarwood?

24 A. No, not necessarily. If they provide  
25 professional learning through First District RESA, I

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1 have staff that might attend the professional learning,  
2 but they're not associated with Cedarwood.

3 Q. I see. Okay. I think that gives me a pretty  
4 good sense of the structure. I'm going to start  
5 talking about the students now and teachers.

6 You gave us some spreadsheets that had some  
7 data on it that I'm going to share with you now. I'm  
8 going to share a redacted version, which means I have  
9 blacked out the students' names, the students IDs, and  
10 their date of birth so that -- to protect their privacy  
11 because, you know, you gave us this information but  
12 some people -- it could become part of a record that  
13 would not otherwise necessarily have rights to see that  
14 information.

15 So I'm going to show you the document, and  
16 I'll just represent to you that other than the fact  
17 that I've blacked out those columns and I narrowed a  
18 notes field that was empty, I just narrowed it so it  
19 could fit on one page, but otherwise it is the  
20 documents that you produced to us.

21 And I'm going to share the first one for our  
22 records is 000144. And I'm going to give you control  
23 so that you can zoom in because it's very small. You  
24 might need to zoom in to be able to read it. And I'm  
25 going to ask if you recognize this document.



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1 A. Yes, I do.

2 Q. What is it?

3 THE REPORTER: I'm sorry, Counsel, did you  
4 mark that one.

5 MS. TAYLOE: Oh, I'm sorry. This is  
6 Exhibit 251.

7 THE REPORTER: Thank you.

8 (Plaintiff Exhibit 251 marked.)

9 MS. HERNANDEZ: Hey, Laura, is there a way you  
10 can zoom in on the document?

11 MS. TAYLOE: I think she has control of it,  
12 but do you want me to --

13 MS. HERNANDEZ: Yeah, I can't see.

14 BY MS. TAYLOE:

15 Q. Do you know how to zoom in, Ms. Braddock?

16 A. I've zoomed in. Yeah, okay.

17 Q. There's also a view. Up at the upper left  
18 there's a view you can click.

19 A. Yeah, that's what I was using, but I've got to  
20 get it so that I can now see. This is a document that  
21 we call our report card.

22 Q. Okay. And which site is it for?

23 A. That, I can't tell.

24 Q. Do you want me to take control back and  
25 enlarge it?

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1 A. Yeah, please.

2 Q. Okay. Should I go bigger than that?

3 A. No, that's fine. This would be for our Lyons  
4 site.

5 Q. Okay. I'm going to give you back control  
6 then. And you said you called it a report card?

7 A. That's what we call it, yes.

8 Q. Okay. Were you involved in the preparation of  
9 this document?

10 A. Yes.

11 Q. Is it something that you produced just in  
12 response to our request or it sounds like you have it  
13 on hand generally?

14 A. Yeah, we have it on hand. We use this -- we  
15 do a different one every year.

16 Q. And what do you use it for?

17 A. So that I can see what students are at each  
18 site, what school system they're at, what school  
19 they're at when they enter, when they exit, and what  
20 kind of services they've gotten.

21 Q. Okay. And when you say when they enter, it  
22 looks like -- do you see in the column where it says  
23 entry date they all have August dates?

24 A. Yes.

25 Q. They all have August dates of 2021?

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1 A. Yes.

2 Q. Is that because that's when they entered the  
3 GNETS program or is that the start of that school  
4 year?

5 A. It's the start of that school year.

6 Q. Do you have elsewhere information about when  
7 they entered the GNETS program?

8 A. That would be in their file, their student  
9 file.

10 Q. Okay. But you don't -- you don't track that  
11 in aggregate?

12 A. No.

13 Q. So this document you said was for Lyons, and  
14 because the entry date is 2021, can I assume that it is  
15 for the school year 21/22?

16 A. Yes.

17 Q. And you have 23 students listed; is that  
18 correct? You can scroll down at the bottom and it has  
19 tiling?

20 A. I'm trying to get there. Yes. 23 students,  
21 yes.

22 Q. And is that number sort of recently  
23 representative of the enrollment for the past few  
24 years?

25 A. Yes.

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1 Q. Have there been any trends upwards or  
2 downwards?

3 A. Our numbers have been on a downward trend.

4 Q. Is it lightly downward or significantly  
5 downward?

6 A. Slightly downward.

7 Q. And over what period would you say this  
8 downward trend has been going?

9 A. I'm not really sure.

10 Q. Do you expect -- do you anticipate the  
11 enrollment numbers will change significantly for next  
12 year?

13 A. I don't expect that, no.

14 Q. Do you already know how many students you'll  
15 have next year?

16 A. I don't off the top of my head. I'm sorry.

17 Q. Okay. That's fine. Okay. In the column  
18 titled grade, do you see -- I'm sorry, grades ranging  
19 from second grade through twelfth grade?

20 A. I'm trying to get up there. Am I the one  
21 moving this or you?

22 Q. You have control but I think our mice are  
23 fighting each other.

24 A. Okay. Let me see if I can get it to move.  
25 There we go. I'll come back again.

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1 Q. So in the column it says grade in between the  
2 blacked out areas.

3 A. Yes.

4 Q. There are students listed there between second  
5 and twelfth grade; is that correct?

6 A. Yes.

7 Q. For what grades does Lyons site offer  
8 services?

9 A. We are open for services from students who are  
10 five years old until they are 22, their 22nd birthday,  
11 depending on the school system that they come from and  
12 what their policy is.

13 Q. Then in the FTE column, it's teal on this one.  
14 It's empty there. Can you tell me why?

15 A. My assumption is that -- and I can say this is  
16 because we haven't had FTE. So after the October  
17 collection of FTE, a mark would have been put there for  
18 any student that was there on the day that FTE was  
19 collected.

20 Q. So this report may have been prepared before  
21 the October account day?

22 A. Yes.

23 Q. So at the end of the year, you would have  
24 marks in both those columns for whoever was there on  
25 those dates?

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1 A. Yes.

2 Q. Okay. And how is FTE used to -- how is FTE  
3 used?

4 A. FTE is used -- each system collects their own  
5 FTE counts. And GNETS doesn't receive FTE money, so  
6 that goes back through their systems if they are  
7 receiving money for that but...

8 Q. So you keep the count so that the sending  
9 district can report the FTE in their account?

10 A. I just keep it so that we know that they were  
11 there during that time if there ever is a question  
12 about it.

13 Q. Okay. And for the record, what does FTE stand  
14 for?

15 A. I don't know. Federal something equivalent.

16 Q. Is it possible it's full time equivalent?

17 A. There you go, yes. That's it. Good for  
18 you.

19 Q. I'm not supposed to testify but --

20 A. Thank you. I was drawing a blank.

21 Q. And the reason I want to ask about that is  
22 because I know some of your students do some of their  
23 segments at GNETS and some of their segments elsewhere.

24 How does that play into the FTE count?

25 A. If a student was getting -- was receiving a

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1 service at their LEA, then that service would be  
2 counted for the LEA.

3 Q. So let me make sure I understand this. So  
4 even if a student is at GNETS for four segments and at  
5 their LEA for two segments, that would still count as a  
6 FTE here because they're with LEA regardless, whether  
7 they're with you or with the LEA.

8 Is that correct?

9 A. Say that again, please.

10 Q. I just don't know if you count full time  
11 equivalent even if they're only at GNETS part of the  
12 time. But what I was understanding you to say it it's  
13 counted towards the LEA. They're at the LEA full time  
14 even if they're only at the Cedarwood center part of  
15 the time.

16 A. No. It would be for the amount of time they  
17 are at the LEA.

18 Q. So why would any of these students have any  
19 FTE count then if they're at GNETS -- if they're at  
20 Cedarwood?

21 A. Well, they're coded a four, I believe, if  
22 they're receiving GNETS services. But if they are  
23 receiving a class in, for example, Statesboro High  
24 School in an EBD service there in an inclusion class,  
25 they would be coded for whatever the code is for

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1 that.

2 Q. Okay.

3 A. I don't do FTE, so I don't really know what  
4 all those codes are.

5 Q. Yeah, I don't know that it matters for my  
6 purposes. I was just curious because your funding is  
7 not based on FTE anyway, so we don't really need to  
8 worry about that.

9 A. Right.

10 Q. Okay. So in the column marked primary  
11 eligibility, can I just confirm that EBD is what we've  
12 been talking about as emotional behavioral  
13 disability?

14 A. Yes.

15 Q. And what does ASD stand for?

16 A. Autism spectrum disorder.

17 Q. And SDD, does that stand for severe  
18 developmental delay?

19 A. Yes, that's it.

20 Q. TBI?

21 A. Traumatic brain injury.

22 Q. And MID?

23 A. Mild intellectual disability.

24 Q. Okay. And are each of those listed as  
25 eligibility because that forms the basis for their



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1 eligibility to receive GNETS services?

2 A. That is their -- the eligibility that they  
3 currently have which would have been what they would  
4 have had prior to coming to GNETS unless they've had a  
5 reevaluation after that time and then it may have  
6 changed.

7 Q. So their eligibility may have changed?

8 A. If they had a reevaluation.

9 Q. Okay. Can you explain what the highest level  
10 of service column means?

11 A. Let me try to get to the top of it so I can  
12 see. I want to be sure. There we go. Was that you or  
13 me that did that?

14 Q. That's you.

15 A. Okay. So the highest level of service means  
16 if they were with us full time, which would have been  
17 16 to 30 segments per week, part-time 10 to 15 -- or 0  
18 to 15.

19 And then direct services means that they -- if  
20 they're in our program, they're not served with us but  
21 they had been in the past. And that we then were  
22 keeping track of them where they are so that we can  
23 help the teacher with any problems that come up. And  
24 then intake would have been a student that has been  
25 referred to us for services or for help.

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1 Q. When you say direct services you're keeping  
2 track of them, is that also providing consultative  
3 services that you spoke of before or just --

4 A. Yes.

5 Q. -- keeping track?

6 A. Consultative services.

7 Q. Okay. What kinds of services are included in  
8 there?

9 A. Where we would check in with their teachers to  
10 find out how they are doing behaviorly, if there's  
11 anything that we needed to help with.

12 Just it may be, for example, if a student were  
13 having a problem, one of the staff may come over and  
14 talk to the student to find out what was going on, what  
15 we could help with.

16 It's somewhat of a check-in so that we can  
17 keep them and handle any behavior issues before they  
18 become an issue for them.

19 Q. So how long do you continue to track students  
20 after they've gone back to their home school?

21 A. It's dependent on the student and the school  
22 and how they have been doing.

23 Q. What's the range?

24 A. It could be a year where we would track them  
25 for a year, and if nothing else went on and things were

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1 going smoothly, we may not do that anymore. Or it  
2 could possibly be until they graduated.

3 Q. So in this one, you have 18 students listed as  
4 full time 16 to 30 segments and one is part-time. Is  
5 that fairly typical, at least for the Lyons site?

6 A. Yes.

7 Q. Okay. And four -- it's looks like five are  
8 receiving direct services, but we can't tell from that  
9 how long ago they exited because, like you said, it  
10 could be a range of time?

11 A. Right.

12 Q. And then the rest of the columns, why are they  
13 blank?

14 A. Well, from what I can tell of this document,  
15 it was probably prepared and then sent to you all at  
16 the beginning of the school year. So none of the other  
17 events may have happened yet.

18 Q. So similar to the FTE, it would be funded  
19 later in the year but just not at the time that this  
20 was sent?

21 A. Yes.

22 Q. Okay. All right. And then, for the record,  
23 the tallies at the bottom of the spreadsheet, did you  
24 calculate those using the data in the spreadsheet  
25 itself?

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1 A. Yes.

2 Q. Okay. Thank you. I'm going to show you now  
3 with the same explanation about its origins labeling  
4 the version for Statesboro. And I will take control  
5 back again so I can enlarge it. I'd like to introduce  
6 as Exhibit 252 document 000145.

7 (Plaintiff Exhibit 252 marked.)

8 BY MS. TAYLOE:

9 Q. Can you see that?

10 A. Yes.

11 Q. Okay. I'll give you back control. Okay. Can  
12 you tell me what this document is, please.

13 A. It would be the report card document for the  
14 Statesboro site for school year 21/22.

15 Q. And all the headings and everything we  
16 discussed for the last one is also true for this form  
17 as well?

18 A. Yes.

19 Q. Okay. There's one additional code I wanted to  
20 ask about, OHI. You have OHI in the primary  
21 conceptuality code. What does that stand for?

22 A. Other health impairments.

23 Q. Okay. And now I don't want you to reveal any  
24 information about the students. We're still trying to  
25 respect their privacy. But can you tell me what kinds

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1 of things fall in the OHI category?

2 A. It can be things like attention deficit  
3 disorder, optional defiant disorder. That's what I can  
4 think of at this time, yeah.

5 Q. So ADHD could be a basis for enrollment in  
6 GNETS?

7 A. If there were behavior issues also.

8 Q. Okay. Do you understand one of the students  
9 at Statesboro for their OHI to be epilepsy?

10 A. I don't recall.

11 Q. And do you understand one of the OHI there to  
12 be -- well, I'll leave that. I'm going to come back to  
13 the summary. So this year's report has 36 students  
14 listed.

15 Is that fairly typical for the Statesboro  
16 site?

17 A. Yes.

18 Q. And is that also having the same trend in  
19 terms of slightly declining at the moment?

20 A. Yes.

21 Q. Do you have an opinion as to why the number of  
22 students is declining?

23 A. I don't know.

24 Q. Are you receiving fewer referrals or are the  
25 referrals not being accepted?

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1 A. While we try to work with students before they  
2 ever are referred, our school systems and the special  
3 ed directors can ask for consultation. And to then we  
4 go and work with the teachers and the administration at  
5 a school to try to keep a referral from happening.

6 So, yes, we have gotten fewer -- we have  
7 gotten fewer referrals for students to be placed with  
8 us but have tended to have gotten more referrals for  
9 our assistance.

10 Q. Assistance meaning the consultative services  
11 provided in the GNETS setting?

12 A. Yes.

13 Q. Okay. Now, in this document in the counseling  
14 column, there are numbers in this one unlike in the  
15 Lyons one.

16 Can you explain is that because maybe this was  
17 done at a different time or they received services  
18 earlier than the Lyons site?

19 A. Let's see. Are you moving it or am I?

20 Q. You have control.

21 A. Okay. I had it about where I needed it and  
22 then it moved.

23 So the person filling this out would have  
24 already known some of the students that were receiving  
25 counseling on-site. And through an outside agency

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1 really, probably mostly in anticipation of that, it  
2 might have later been adjusted.

3 Q. Okay. So your understanding, then, is that  
4 this reflects the number of students who during the  
5 course of the year receive these services even if it  
6 hadn't happened yet?

7 A. That were known to them at that time, yes.

8 Q. And how is it decided who gets counseling from  
9 the Cedarwood counselor and who gets counseling from  
10 another agency?

11 A. If the students are going to get counseling  
12 from the Cedarwood counselor, then their parents would  
13 have had to have given permission for that.

14 Q. Parents of GNETS students have to give  
15 permission for those students to receiving counseling  
16 from a GNETS counselor?

17 A. Yes.

18 Q. And do they have to get permission to receive  
19 counseling from other agencies?

20 A. Yes. I mean, if they were seeing an outside  
21 agency, that would mean that their parent was taking  
22 them to counseling appointments somewhere else.

23 And then on-site agency would mean that the  
24 parent may have worked, already gotten an on-site -- a  
25 counselor to see them, and we provide them space to see

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1     them at school.

2           Q.     I see. I think I see. So these would be  
3     preexisting relationships that the parents have with  
4     other counselors that may take place in your offsite  
5     and continue seeing them wherever they see them or  
6     Cedarwood provides a place for the agency to come see  
7     the student during the school day at Cedarwood?

8           A.     Yes.

9           Q.     But this is something the parents would have  
10    arranged and you accommodate their schedule?

11          A.     Yes and no. It could work with -- they could  
12    have been referred to a counseling agency from a  
13    different agency, and we then work with them through  
14    that provider.

15          Q.     And when you say referred by another agency,  
16    what does -- like a service for justice kind of agency  
17    or another service provider?

18          A.     Yeah, it could have been Department of  
19    Juvenile justice agency that referred the family to  
20    that kind of counseling, and so then they come to the  
21    school to see the student and we provide space for them  
22    and work with them.

23          Q.     Okay. And so as of the time this form was  
24    filled, your understanding is that none of the parents  
25    have provided permission for the students to see the



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1 counselor?

2 A. Yes, and it possibly just hadn't been filled  
3 in yet.

4 Q. Do parents have to fill that form out every  
5 year?

6 A. Yes.

7 Q. Okay. So we've talked about all the different  
8 counties and the cities that the students come from for  
9 Cedarwood. Is transportation provided for these  
10 students?

11 A. Yes.

12 Q. By whom?

13 A. By their school system.

14 Q. Okay. Do you have a sense about what the  
15 range in the duration of their bus rides is?

16 A. I can guess, but I don't know for sure.

17 Q. Do you think any students are on the bus for  
18 as long as a hour?

19 A. There's a possibility, yes.

20 Q. Do you know if any of the districts use a  
21 bussing hub?

22 A. I'm not sure.

23 Q. So students arrive at Statesboro on a bus  
24 provided by the sending districts, but you wouldn't  
25 have information about whether they've had to change

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1 buses or --

2 A. Yeah, I don't know.

3 Q. Okay.

4 MS. TAYLOE: Stacey has a hand raised.

5 MS. SUBER-DRAKE: I'm sorry, it should not be  
6 raised.

7 MS. TAYLOE: Oh, okay. I just wasn't sure of  
8 the protocol.

9 MS. SUBER-DRAKE: Let me figure out how to let  
10 it back down.

11 MS. TAYLOE: This could make for funny  
12 transcripts and forget about Zoom days.

13 Q. What time -- and if this varies by site feel  
14 free to break it out. But what time do the buses  
15 arrive at the school at Cedarwood?

16 A. I cannot give you a definitive answer.

17 Q. Okay. Do they arrive before the first bell or  
18 do they arrive during the arrival? There's an arrival  
19 window on some of the schedules. Is there a range?

20 A. There would be a range, and I'm not really  
21 certain what it is for both sites just because I don't  
22 deal with that daily.

23 Q. And how about for dismissal. Do any students  
24 leave to get on their bus before the conclusion of the  
25 instructional day?

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1           A.     There would be students that would leave  
2 throughout the day if they're going back to their local  
3 school system to have classes and participate in  
4 classes for that.

5           Q.     That's good to know. How does that work? Are  
6 there -- so the sending district also sends a bus for  
7 that transportation as well?

8           A.     Yes.

9           Q.     And do you know how the schedule works for  
10 that? Do they leave in time to arrive for the class  
11 they're joining at the other school?

12          A.     That is what we definitely try to do to  
13 provide that, yes.

14          Q.     Okay. And aside from that, if students aren't  
15 going to a class at their LEA, if they're just getting  
16 a ride home, do they ever need to leave about the end  
17 of their instructional day to get on their bus?

18          A.     I'm not sure.

19          Q.     Okay. I want to ask a little bit about how  
20 with the varying numbers of students even within the  
21 course of a school year that you do -- let me back up  
22 and lay that foundation.

23                 Do you have students arrive during the school  
24 year in addition to the ones we saw arrive in August?

25          A.     Yes.

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1 Q. How do you plan staffing and, you know, space  
2 for a fluctuating number of students?

3 A. I want to say on a wing and a prayer, but if  
4 we had a big influx of students, possible referrals or  
5 move-ins, then we might have to have additional staff.  
6 It's not happened, but I assume that it could.

7 Q. So, generally, you have enough leeway in your  
8 enrollment numbers that if you had new students come  
9 they could fit in too?

10 A. Yes.

11 Q. How is the funding for that determined?

12 A. Can you clarify for me a little bit?

13 Q. Well, we said we don't use FTE for GNETS  
14 funding. Does student enrollments play some role in  
15 your funding?

16 A. Yes, as I best understand it. So GNETS  
17 funding is based on the number of students that are  
18 served during the school year based on a three-year  
19 rolling weighted average.

20 THE VIDEOGRAPHER: I've got about five minutes  
21 left on Media 1.

22 MS. TAYLOE: Okay. Thank you.

23 Q. So I hadn't heard that before so three-year  
24 rolling average. Is it the number of unique students  
25 or the number of students on a count day?

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1 A. As I best understand it, at the end of the  
2 year we look at student count. So students that have  
3 been served by Cedarwood for at least ten days we are  
4 given credit for that student, and then that goes into  
5 our grant numbers. I don't know how any of that is  
6 figured.

7 Q. And when you say student served for at least  
8 ten days, do you frequently have students serve for  
9 less than ten days?

10 A. No, not frequently.

11 Q. Sometimes?

12 A. Sometimes, yes.

13 Q. Where do they go after less than ten days if  
14 they don't stay?

15 A. As an example, you may have a student who is  
16 put into a foster care home has moved in and then is  
17 removed from that foster care home before the end of  
18 ten days.

19 Q. Okay. What is the average -- to the best of  
20 your understanding, what is the average some folks stay  
21 at Cedarwood?

22 A. I don't really know.

23 Q. Okay. What is the longest time you've known a  
24 student to remain at Cedarwood?

25 A. I have known of students to remain at

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1 Cedarwood for ten years.

2 Q. And when you talk about students served for  
3 your funding, does that include consultative services  
4 or just the students enrolled in one of the sites?

5 A. Just students enrolled in one of the sites.

6 Q. Does funding for consultative services through  
7 some other way or do you --

8 A. No.

9 Q. Okay. So funding is exclusively based on the  
10 student count on the three-year waiting enrollment you  
11 talked about?

12 A. Yes.

13 Q. So you've known of students to remain at  
14 Cedarwood for ten years. And you said earlier you  
15 don't track an aggregate length of stay. Do you review  
16 length of stay periodically for students?

17 A. No.

18 Q. Have you had students leave Cedarwood and then  
19 come back?

20 A. Yes.

21 Q. And for purposes of counting, would they be  
22 counted -- is it counted by admission or by student?

23 A. By student. They would only be counted  
24 once.

25 Q. Okay. Does that happen sometimes within the

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1 same year?

2 A. Yes.

3 Q. What kinds of things do you think help that  
4 happen?

5 A. Hospitalization or a move.

6 Q. How would a move -- I understand  
7 hospitalization. How would a move result in that?

8 A. If a student was in a foster care home or a  
9 group home and was moved somewhere else and then moved  
10 back to a different one, that's an example that has  
11 happened in the past.

12 THE VIDEOGRAPHER: And we've got about two  
13 minutes, if this is a good time.

14 THE WITNESS: He needs to change his  
15 battery.

16 MS. TAYLOE: Okay. We can take a quick  
17 break.

18 THE VIDEOGRAPHER: This is the end of Media 1  
19 in the deposition of Director Whitney Braddock. We are  
20 off the record at 11:30.

21 (Recess.)

22 THE VIDEOGRAPHER: This is the beginning of  
23 Media 2 in the deposition of Director Whitney Braddock.  
24 We are back on the record at 11:31.

25 BY MS. TAYLOE:

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1 Q. Okay. And I just wanted to back up for a  
2 second. I asked you -- you said it was possible for  
3 students to be on the bus for an hour.

4 Do you have a sense of what the upper limit in  
5 terms of their bus ride might be?

6 A. I do not.

7 Q. Okay. You've mentioned foster care a couple  
8 of times. Do you have -- does Cedarwood have a  
9 significant number or a notable number of students in  
10 foster care enrolled?

11 A. We at our Statesboro site have had a  
12 fluctuation of students due to several group homes and  
13 therapeutic foster care settings that have been in the  
14 Bulloch County area.

15 So that has become somewhat significant. We  
16 do have students that are in foster care at our Lyons  
17 site also.

18 Q. When you say fluctuation of the group homes or  
19 therapeutic foster care placements, what does that  
20 mean?

21 A. Over the past five years there have been  
22 several group homes and therapeutic foster care homes  
23 opened in Bulloch County.

24 Q. And has that resulted in an increase of the  
25 number of students?



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1 A. That has because the students would have  
2 already received or were receiving -- their IEP was  
3 that they were receiving your GNETS services where they  
4 were. So when they moved in, their IEP was then picked  
5 up.

6 Q. So a student who was in a GNETS placement in  
7 one foster care -- I'm sorry -- enrolled in a GNETS  
8 program in one foster care placement, if their foster  
9 care placement gets changed, they become enrolled in  
10 the GNETS program that serves that area?

11 A. Yes.

12 Q. Have you had students in your program placed  
13 into RTFs? I'm sorry, residential treatment  
14 facilities.

15 A. Yes.

16 Q. This past year?

17 A. I'm not sure.

18 Q. How often does that happen?

19 A. It just really depends and it varies. I don't  
20 say it's a significant amount.

21 Q. Okay. Do you keep attendance records for  
22 which students attend each day?

23 A. Yes.

24 Q. Who collects that data?

25 A. The school administrative assistant.

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1 Q. And does anybody review that data?

2 A. It's in a Google Drive, a Team drive that we  
3 have, and I will check it to be sure that it's being  
4 done. But they also report the attendance to each  
5 student's home school.

6 Q. So you check to make sure it's done. But do  
7 you check to see if there's any attendance issues to  
8 address?

9 A. Yes, I do.

10 Q. And what would be a red flag in terms of  
11 attendance?

12 A. Like a three- to five-day absence. Now,  
13 that's prior to COVID. Since COVID it kind of becomes  
14 a little more difficult because of quarantining and  
15 that kind of thing. But I will question people and ask  
16 what's going on. Why has student X not been at  
17 school.

18 Q. What about nonsequential but, you know, adding  
19 up absences?

20 A. We will look at that, and generally what we do  
21 is then report it back to their local school system for  
22 them to handle that. I mean, we call parents and check  
23 with parents as to why a student is absent.

24 Q. How far back does the Google Drive database  
25 go?

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1 A. Say that --

2 Q. Does the Google Drive database that sends the  
3 attendance in, is that only for a given year or does  
4 that store data back into that?

5 A. It's only for a given school year.

6 Q. Okay. Are students ever asked to stay home or  
7 sent home due to problem behavior?

8 A. They could be. They would be suspended from  
9 school.

10 Q. And would that count or would that be recorded  
11 as an unexcused absence or excused absence or something  
12 else?

13 A. We record it as a suspension.

14 Q. What about if there's not sufficient staff  
15 available on a given day. Is he ever asked to stay  
16 home or sent home for that?

17 A. We have not, no. There have been times since  
18 COVID that you would question whether or not we could  
19 safely, you know, run schools. But it's been that we  
20 have not had to do that.

21 Q. Do you have on-site subs who can fill in when  
22 there's a teacher absent?

23 A. We do. Well, we have some auxiliary staff  
24 that would fill in or we have really just a couple of  
25 subs that we bring in. We don't just put anyone in

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1 class.

2 Q. What is auxiliary staff? What kind of staff  
3 is that?

4 A. Well, we have a paraprofessional at both sites  
5 that is a behavior interventionist. So that person can  
6 do it. Sometimes if you are the administrative  
7 assistant you might go into class. If you're the  
8 consultant teacher, you might go into class.

9 So those folks, the coordinator at the site,  
10 would go into class.

11 Q. That's a good segue into our section on staff.  
12 How many staff in total are employed by the Cedarwood  
13 program?

14 A. It's approximately 28 to 31.

15 Q. And how many -- who determines the staffing  
16 needs. Who determines how many staffing you have?

17 A. I do based on the number of students that  
18 we're serving.

19 Q. And what ratio do you use to determine the  
20 need?

21 A. We generally look at classrooms having from 6  
22 to 10 students.

23 Q. Are there some staff, in addition to yourself,  
24 who serve the program as a whole instead of as a  
25 specific location?

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1 A. I do, our counselor does, and our consultant  
2 teacher does.

3 Q. How do they split their time between the two  
4 sites?

5 A. The counselor spends -- his home base is our  
6 Lyons site, but he spends two days at the Lyons site  
7 counseling. He spends two days at the Statesboro site  
8 counseling, and then he has an office day at the Lyons  
9 site one day a week.

10 And the consultant teacher spends her time at  
11 the Lyons site. But if she is needed to go and do a  
12 consultation at Statesboro, at one of those counties,  
13 she would do that. She also does some training at both  
14 sites.

15 Q. How far apart are the Statesboro and Lyons  
16 sites?

17 A. About an hour apart. I think that is probably  
18 about 48 miles maybe. Maybe a little less.

19 Q. All right. I'm going to mark as Exhibit 253  
20 document 001394 and I'm going to share this with you.

21 (Plaintiff Exhibit 253 marked.)

22 BY MS. TAYLOE:

23 Q. And I'll ask you if you recognize this  
24 document.

25 A. Yes.

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1 Q. Can you tell us what it is, please.

2 A. It's our staff document.

3 Q. Okay. And we discussed your role as director,  
4 and we discussed the role of the program evaluator a  
5 little bit before. Can you tell me does she have  
6 education background or experience?

7 A. No.

8 Q. Does she have an administrative background?

9 A. No.

10 Q. The way you described her responsibilities  
11 before is more records and billing and  
12 budgeting-related matters. Right?

13 A. Yes.

14 Q. And who is she employed by?

15 A. She's employed by Cedarwood.

16 Q. Are you the only one that's employed by the  
17 RESA?

18 A. Well, everyone is employed by RESA because  
19 they write the checks. But, like I said before, we  
20 consider ourselves employed by Cedarwood.

21 Q. Okay. So is everybody on this chart employed  
22 in terms of who pays the checks by RESA?

23 A. Yes. I'm trying to look at it. I can't get  
24 it to move, but it should be. Yes.

25 Q. So I'm trying to think how to ask it. We're

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1 going to talk about funding later, but I have to ask  
2 this to make it make sense.

3 The program makes the bulk of its money from  
4 the GNETS state grant; is that correct?

5 A. Yes.

6 Q. Does that money come to you or does it go to  
7 the RESA?

8 A. It goes to the RESA.

9 Q. Okay. So the money is allocated for  
10 Cedarwood, but it goes to RESA, and RESA distributes it  
11 through payments and things like that?

12 A. Yes.

13 Q. Okay. I didn't understand that before.  
14 That's helpful.

15 Okay. Are there any -- so I'm going to move  
16 on to the coordinators. Are there any required  
17 professional qualifications for the coordinator  
18 position?

19 A. They would have a teaching certificate.

20 Q. Is there any content or grade level  
21 requirement associated with that?

22 A. No.

23 Q. Is it required to be a special ed  
24 certificate?

25 A. I don't know that it's a requirement, but it

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1 is for me. You would have experience with special ed,  
2 yes.

3 Q. And the distinction is it's not a requirement  
4 but it is for you. Who else would the requirement be  
5 set by?

6 A. I guess I was saying that I didn't know if  
7 other places, other GNETS, had different  
8 requirements.

9 Q. Okay. So you get to set the requirements for  
10 all the positions?

11 A. Yes. Excuse me, yes.

12 Q. Are teachers required to have -- are teachers  
13 required to be trained or certified teachers?

14 A. Yeah, they need to have certification through  
15 the Georgia Professional Standards Commission.

16 Q. Is that a requirement you set or someone else  
17 sets?

18 A. It's a requirement for someone that teaches in  
19 the State of Georgia.

20 Q. Okay. So you can set -- you can set some  
21 requirements, but it's bound by the requirements that  
22 govern all teachers?

23 A. Yes.

24 Q. Okay. Is the same thing true for  
25 paraprofessionals as well?



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1 A. Yes.

2 Q. And so there's no exemption that GNETS  
3 teachers or GNETS professionals could meet a lower  
4 professional requirement standard than other teachers  
5 in the state or other paraprofessionals in the state?

6 A. No.

7 Q. Why are some of the teachers and  
8 paraprofessionals on this list in parenthesis?

9 A. Let's see, I'm trying to move it so I can see  
10 which ones you're talking about. It would have been  
11 that either they had just been hired or moved into that  
12 position and we were waiting on certification to come  
13 through.

14 Q. So you mean moved into that position but they  
15 had not yet been certified?

16 A. Right. It had been applied for or this may  
17 not have been updated after the beginning of the school  
18 year.

19 Q. And so are you referring to the provisional  
20 type of certification you had when you started?

21 A. That and just for the paraprofessionals, they  
22 may not have been hired with a paraprofessional  
23 certificate. We would have had to have applied for it,  
24 and we were in the midst of that.

25 Q. Okay. Can you describe what an

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1 interventionist does?

2 A. Those are paraprofessionals that -- I don't  
3 even know what I'm doing to this. I'm trying to move  
4 it up just a little bit to be sure that I'm speaking  
5 the same language as you.

6 Q. Can you -- there's a scroll bar on the right.

7 A. Thanks. Okay. The interventionist, they're  
8 paraprofessional behavior interventionists. They are  
9 additional support to classrooms.

10 They also pull students and do some of the  
11 tiered interventions for students who are in different  
12 tiers of -- need different tiers of support.

13 They do some of the SEL interventions with the  
14 students and they just add additional support to the  
15 site.

16 Q. Are they certified teachers?

17 A. They are certified paraprofessionals.

18 Q. Okay. And what is a social worker tech?

19 A. It's someone who helps with things like making  
20 parent contacts, doing intake, that kind of thing with  
21 students, getting paperwork back and forth to parents,  
22 setting up and doing -- like if a student did virtual  
23 counseling, then that person would be the one that  
24 would help set that up and supervise it while the  
25 student was doing their virtual counseling.

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1 Q. And is there a reason why each -- Statesboro  
2 has one and Lyons has the other one. They used to each  
3 have both?

4 A. Say that again. I'm sorry.

5 Q. One has an administrative assistant and one  
6 has a social work tech, and they used to -- each site  
7 used to have both but now they're down to one. Is that  
8 a funding issue or a needs issue?

9 A. Funding and needs, yes.

10 Q. Can you elaborate?

11 A. Well, as our numbers decrease, then our  
12 funding decreases. And so when our numbers also  
13 decrease, there's less of a need and the positions can  
14 be combined.

15 Q. And about the teachers, are they all certified  
16 in special education?

17 A. They are. Cheryl Baker on there was not last  
18 year. She was working on that certification. She  
19 didn't pass the testing that needed to be passed.

20 So she then was not as -- she was filling in  
21 as the teaching until that happened but it didn't. She  
22 actually has done that now and is part of -- has got a  
23 provisional certification now.

24 Q. Everybody else is fully certified in special  
25 ed?

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1 A. The ones that I can see are. I need to move  
2 it over to the right. There we go. Yes, all of them  
3 are.

4 Q. Is there something different about the funding  
5 for Cody Brannon?

6 A. We are reimbursed from Bulloch County Schools  
7 for Cody. But he is our employee, so we pay him and  
8 then they reimburse us for his -- we invoice them for  
9 his pay and benefits.

10 Q. Why is that?

11 A. The classroom in Bulloch County in Statesboro  
12 that has the students with intellectual disabilities  
13 and autism, we didn't have a class for them in the  
14 past, and they needed -- they had some students with  
15 severe behavioral problems that fit into that category  
16 and they needed us to serve them.

17 And because it was in addition to what I  
18 really had funding for, it was actually decided before  
19 I became the director. So it's just something that's  
20 been carried on and we've continued with that  
21 classroom.

22 Q. So that was negotiated directly with Bulloch  
23 County that they wanted this extra classroom served?

24 A. Yes.

25 Q. And we would refund the teacher for it?

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1 A. Yes.

2 Q. And that's specifically for students with  
3 intellectual disabilities and ASD?

4 A. Yes, that have severe behaviors associated  
5 with that.

6 Q. Are any of the paraprofessionals eligible for  
7 but not yet certified?

8 A. On this list?

9 Q. We'll start with on this list, yes.

10 A. I believe they are all certified. I'm going  
11 to scroll down. Yeah, they're all certified.

12 Q. Okay. And are there others not on the list  
13 that will not be?

14 A. Well, we're starting the new school year and  
15 I've had turnover, so not all these people are  
16 currently employed by us. And so we're in the process  
17 of hiring folks and having -- getting them certified.

18 Q. Is it a common occurrence to hire someone who  
19 is not yet certified and have them obtain the  
20 certification in the course of their employment?

21 A. Yes.

22 Q. Is there any requirement -- what are the  
23 hiring criteria for certifying paraprofessionals?

24 A. They have to have a high school diploma or an  
25 equivalent and a clean background check. Those are

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1 requirements.

2 But when I'm looking at people, I hire  
3 people -- I look for folks who have experience working  
4 with children and in a possible special ed setting or  
5 with people with special needs.

6 Q. And once somebody without a certification but  
7 with those qualifications start, how long would it take  
8 to become certified as a paraprofessional?

9 A. If they have two years of college, then we  
10 just have to do the application. If they don't have  
11 two years of college, then they have to take a parapro  
12 test, they have to sign up to take the Parapro GACE,  
13 pass that, and then we do the application.

14 Q. You said take a parapro test, and then there  
15 was something else in the application. GACE?

16 A. GACE. The parapro test is the GACE test  
17 G-A-C-E. I don't know what that stands for.

18 Q. Okay. So there's not any instruction  
19 associated with it. They take the test and then  
20 apply?

21 A. Yes.

22 Q. What is -- is that the certification for  
23 everybody or is that -- is there someone who's a  
24 paraprofessional who has a high school diploma and has  
25 passed the GACE test and that's enough for

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1 certification?

2 A. Yes.

3 Q. And if they've taken two years of college  
4 without regard to what the field of study was, then the  
5 passing the GACE test isn't required?

6 A. Correct.

7 Q. And then just to wrap up staffing, are all the  
8 positions we've discussed -- or which of the positions  
9 we've discussed are full-time, like full-year  
10 positions?

11 A. Do you mean like a full school year or  
12 considered a 12-month contract?

13 Q. A 12-month contract.

14 A. That would only be me.

15 Q. And everybody else is a school year  
16 employee?

17 A. The two coordinators are what are considered  
18 an 11-month contract and then the teachers are a  
19 10-month contract. And paraprofessionals are  
20 classified and they're not under contract, but it is  
21 for the school year, 190 days.

22 Q. Does Cedarwood offer extended school year  
23 services?

24 A. We don't offer that. Students may qualify for  
25 it, and it is then provided by the local school system.

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1 Q. And do any of your staff work for local school  
2 system for those services?

3 A. Yes. They have in the past.

4 Q. Do you know how that is done? Are the  
5 students in -- like in with other students for this,  
6 you know?

7 A. I don't know.

8 Q. Some of your staff, they would contract  
9 directly with the LEA that does the ESY?

10 A. Yes.

11 Q. Do you have any vacancies for the coming  
12 school year?

13 A. I have a paraprofessional vacancy, and we have  
14 just recently hired some teachers, a couple of teachers  
15 and a couple of paraprofessionals.

16 Q. Are they certified eligible but not yet  
17 certified?

18 A. The teachers have not been certified yet but  
19 they are certified eligible. It's a matter of turning  
20 the paperwork in to the Georgia Professional Standards  
21 Commission.

22 And the paraprofessionals, I believe that one  
23 of them already has a paraprofessional certificate, and  
24 the other one does not yet but qualifies for it.

25 Q. Is this level of turnover fairly common at



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1 Cedarwood?

2 A. Yes.

3 Q. Tell me about your recruitment. Your resume  
4 also says you're responsible for recruitment. Tell me  
5 what you do in order to find and attract new hires.

6 A. I place ads on Indeed and in through the DOE  
7 Portal for Teach Georgia. I've been known to ask the  
8 person checking me out at Food Lion if they wanted to  
9 change jobs. Word of mouth. I've not gotten to where  
10 I've asked people on Facebook if they know of anyone,  
11 but I'm not opposed to it.

12 Some of the school systems in the past also  
13 have also like sent over people who they have  
14 applications on but they don't have openings. But  
15 right now that's not something that's happening because  
16 everyone is having a very difficult time finding  
17 people.

18 Q. Yeah, I was going to ask you what you think is  
19 the biggest barrier to hiring, but it sounds like now  
20 staff shortage just generally is common?

21 A. Staff shortages, yes. For paraprofessionals  
22 pay is definitely an issue.

23 Q. And is pay limited by you only get what you  
24 get through the grant?

25 A. It is, yes. But paraprofessionals just in

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1 general make less money because they work 190 days and  
2 then it is -- that pay is spread out over 12 months.

3 Q. When you advertise positions, do you list any  
4 required experience in general education studies?

5 A. It's not required, but it would be preferred  
6 is generally how I put it.

7 Q. Okay. So after you've done those recruitment  
8 and the applications, tell me what the process is on  
9 receiving applications?

10 A. I receive applications, I look over them for  
11 qualifications, and then I contact the person and do  
12 interviews.

13 And then after interviews are done, I then  
14 contact the applicants that meet the most  
15 qualifications and I feel like will be best for the  
16 job, and then I offer them the position. And they are  
17 then approved by the First District RESA Board of  
18 Control.

19 I'm sorry, they have a background check.  
20 They're approved by the Board of Control if their  
21 background check is clean. And then they are then  
22 hired.

23 Q. Are there any -- do you know if any of the  
24 counties that participate have strategic waivers in  
25 place?

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1 A. I don't know for sure.

2 Q. Okay. So it doesn't affect --

3 A. It doesn't affect us at all, no.

4 Q. Okay. So I skipped ahead a little bit and  
5 asked about some of the things that were in the grant  
6 application so I could make sense out of the stuff.

7 Can you describe a little bit about the grant  
8 application process for me.

9 A. Clarify a little bit for me.

10 Q. The GNETS grant application, you sent us  
11 several years worth in response to our subpoena and it  
12 sets forth all kinds of information that you, as I  
13 understand it, report to the state and that forms the  
14 foundation for the grant funds that you get.

15 A. Okay. So the grant is put into the Georgia  
16 Department of Education Portal. I access it and I  
17 answer the questions.

18 Q. And then is funding determined based on the  
19 information in there?

20 A. It is my understanding that funding is only  
21 really based on the number of students that we have. I  
22 don't know about funding being based on what is in our  
23 grant application.

24 Q. Okay. Do you know what the rest of the  
25 information the grant application is used for?

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1 A. I have no idea.

2 Q. Has anyone from the Department of Education  
3 ever reached out to you about -- with questions about  
4 what's in the application?

5 A. Yes. They've asked for clarification as to  
6 what I've put. I couldn't -- I don't know the  
7 circumstances of that. I just remember getting a phone  
8 call that said, "Hey, you said this. Is this what it  
9 is?" I may have put the wrong year or something that I  
10 needed to correct.

11 Q. You don't recall ever getting any substantive  
12 questions about what kinds of services are being  
13 provided or qualifications of teachers or anything like  
14 that?

15 A. No.

16 Q. What best practices are used by staff to  
17 support the students at Cedarwood? What evidence-based  
18 practices?

19 A. Are you talking about affective-type things or  
20 academic?

21 Q. I'm thinking mainly about behavioral and  
22 social emotional. Like, are your staff trained in  
23 trauma informed care for instance?

24 A. Yes.

25 Q. Who provides that training?

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1           A.    I have had a couple of staff who went through  
2   a training that was provided from the DOE or they got a  
3   provider to provide it. And then other trauma informed  
4   care, things that we've learned on our own and then  
5   investigated and then are using.

6           Q.    What do you mean you learned on your own?

7           A.    We would, you know, look at things that other  
8   places are doing, doing some searching for that  
9   using -- looking for evidence-based practices that we  
10  could use.

11                  What I'm saying is they weren't this is what  
12  you have to use. You know, no one has said you have to  
13  use these.

14           Q.    But like you talked earlier like the meetings  
15  might mention some kind of training is available. If  
16  you saw that, you could set it up and take that?

17           A.    Yes.

18           Q.    What kinds of trainings have you and/or your  
19  staff taken part in?

20           A.    We have done Youth Mental Health First Aid.  
21  We have done a training called Person Brain. We have  
22  done LSCI, Life Space Crisis Intervention.

23                  We have -- we're trained in PBIS. We're all  
24  trained in Mind Set, which is a prevention and  
25  technique to use for aggressive students. What else?

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1 That's all I can think of.

2 Q. Okay. You said you were all trained in Mind  
3 Set. Does that mean that some of the other ones you  
4 listed, some of you are trained or were all of you  
5 trained in some more of them?

6 A. So we train as many people as we can like in  
7 LSCI. But say for my new hires, they may have -- they  
8 may have to wait on that training, when that's again.  
9 Everyone on my staff was trained in Youth Mental Health  
10 First Aid and has been in the past, and we just did an  
11 update in June.

12 We're also trained in restorative practices  
13 and restorative justice. But, of course, my new staff  
14 that I'm just hiring don't have that training so...

15 Q. Who provides this training?

16 A. Different people that I might contract with or  
17 if we have someone on staff who is trained as a  
18 trainer. Like, I have two Youth Mental Health First  
19 Aid trainers on my staff that provide the training to  
20 us. I have multiple Mind Set trainers on my staff that  
21 provides the training.

22 Q. And which of the ones you mentioned would be  
23 helpful in deescalating students?

24 A. They are Mind Set techniques we use to  
25 deescalate students. I can't -- off the top of my head

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1 I can't remember another.

2 Q. Can you tell me a little bit about you  
3 mentioned Youth Mental Health First Aid and Person  
4 Brain.

5 A. So Youth Mental Health First Aid is it helps  
6 staff to recognize when students -- well, in our case  
7 it's students -- are in crisis and they need further  
8 help to be referred somewhere else for us to get more  
9 help.

10 It identifies if -- it helps staff identify if  
11 a student is hurting themselves or might hurt  
12 themselves and just to understand really the basis of  
13 mental health problems. And then Person Brain is  
14 one so that you understand where trauma comes from and  
15 how the brain works and handles trauma.

16 By -- I feel like by my staff understanding  
17 that they can then see where students are coming from  
18 and not -- if someone is angry and aggressive, you need  
19 to know where that is coming from and not to take it  
20 personally and not to, you know, what's the best way to  
21 deal with it.

22 Q. And how many staff were the ones that most  
23 have but maybe not the new one or is that a small  
24 subset of people trained?

25 A. That may be a smaller subset. The last time

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1 that we've done a full Person Brain training would have  
2 been in June possibly of '21. I'm not completely  
3 certain.

4 Q. Okay. What about have your staff been trained  
5 in appropriate restraint techniques?

6 A. Yes. That's Mind Set.

7 Q. Okay. So that excludes deescalation --

8 A. Yes.

9 Q. -- and if that doesn't work, then appropriate  
10 restraint techniques?

11 A. Yes.

12 Q. Does Cedarwood have a policy on restraint?

13 A. Yes.

14 Q. What is it?

15 A. Well, the easy part of it is that you don't  
16 restrain a student unless they're in danger of hurting  
17 themselves or someone else. There's like a whole long  
18 policy that's been adopted by the First District RESA  
19 Board of Control.

20 Q. Did you say in danger of hurting themselves or  
21 others or just in danger of hurting themselves?

22 A. Themselves or others.

23 Q. And do you have a policy on seclusion?

24 A. We do not do seclusion at all.

25 Q. Do you do timeout?



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1 A. If we do timeout, then it is supervised. The  
2 students are never alone in timeout and we don't have  
3 timeout rooms.

4 Q. Are there any other words for it like calming  
5 time or isolation or anything like that?

6 A. We have -- well, this school year coming up  
7 we're going to have calming corners, but that doesn't  
8 have anything to do with timeout.

9 It has more to do with trauma informed care,  
10 but it's right in the classroom. But no, we don't.

11 Q. You mentioned some of the training -- I forgot  
12 which one now. One of the trainings you received was  
13 either by GADOE or someone GADOE put you in touch  
14 with?

15 A. Yeah, that was the trauma informed care. I  
16 believe it came from Georgia State College that someone  
17 from there did that I really don't remember.

18 Q. Does that come with any coaching component?

19 A. It did, but we're not receiving coaching now  
20 from it.

21 Q. Why not?

22 A. I don't know.

23 Q. And are there any staff provided by the  
24 Georgia Department of Education at Cedarwood?

25 A. Any staff provided?

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1 Q. Yeah. Do they send anybody to either train or  
2 supervise training or mentor?

3 A. Not directly, no.

4 Q. Indirectly?

5 A. Well, I don't feel like they send them. But  
6 like for the Southeast GLRS, who is at First District  
7 RESA but under the Georgia Department of Education, has  
8 provided us training.

9 Q. Okay. Can you tell me what Teach Town is?

10 A. Teach Town is a virtual training and I guess  
11 maybe that one does go under Georgia Department of  
12 Education. They provide us seats, excuse me, for staff  
13 to go through, the modules that they have that  
14 basically are training -- is training in FBAs.

15 Q. But it's virtual you said?

16 A. Yes, it's done online. There's not really  
17 virtual training. There's modules online that are  
18 completed.

19 Q. Okay. But the Georgia Department of Education  
20 hasn't provided a BCBA trainer to help get any of your  
21 staff certified?

22 A. No.

23 Q. Okay. I think that wraps up my staff section.  
24 I'm happy to start with admissions process, but if  
25 y'all want to take a break for lunch, I can start after

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1 that.

2 THE WITNESS: Some folks are ready to take a  
3 break for lunch, yes.

4 MS. TAYLOE: Okay. Why don't y'all tell me  
5 how long. I've got my lunch here, but I know it might  
6 be more complicated for you there. So you tell me how  
7 long y'all want.

8 THE VIDEOGRAPHER: Should I take us off the  
9 record?

10 MR. NGUYEN: Yeah, why don't you do that.

11 THE VIDEOGRAPHER: Off the record at 12:23.

12 (Recess.)

13 THE VIDEOGRAPHER: We are back on the record  
14 at 1:11.

15 BY MS. TAYLOE:

16 Q. Okay. First I have two questions I want to  
17 sort of clarify from earlier. First, I've been  
18 assuming all along, but I never asked you directly so  
19 I'm going to ask you.

20 Were you responsible for pulling documents in  
21 response to the United States subpoena for documents?

22 A. Yes.

23 Q. Did anyone assist you with that?

24 A. I had some assistance from the coordinators at  
25 each site and from the administrative assistant at the

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1 Lyons site and then the case manager or social worker  
2 tech at the Statesboro site who does that type of  
3 thing. But it all went through me.

4 Q. Okay. And were the documents generally  
5 already in existence or did you create some?

6 A. They were generally all in existence. I don't  
7 know that I created any, but I don't recall.

8 Q. Okay. Thank you. I was assuming you were  
9 involved. I should have asked directly.

10 And then my other clarifying question is you  
11 said that Cedarwood does not use seclusion and the  
12 timeout was supervised. I didn't really ask what  
13 timeout looks like.

14 What are the policies and practices of  
15 timeout?

16 A. Generally, if a student has to leave the room,  
17 then there would be a staff with them to talk to them  
18 to deescalate or work through a problem.

19 They may go to another -- to an office or to a  
20 room that's not being used to talk to the student. If  
21 a student is very upset and doesn't want to leave the  
22 room, we would remove the other students to -- say at  
23 our Statesboro site where we have our room that serves  
24 as our cafeteria, the other students may go there in  
25 order for staff to talk to the other students.

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1 Really, a lot of times that students that get  
2 upset want to run. So by the time we catch up to them,  
3 they'll run out of one door and into another to just  
4 have someone to talk to them.

5 Q. So you said if a student has to leave a room,  
6 is that by the student's choice or by a staff's  
7 determination or both?

8 A. It could be both.

9 Q. So let's see if I got this right. So if a  
10 student is behaving in a way that the staff thinks the  
11 student needs to leave the room, the staff will try to  
12 escort them to one of the rooms that's not being used  
13 and let them calm down there.

14 And if the student doesn't want to do that,  
15 then the staff will take the rest of the class out of  
16 the room?

17 A. Yes.

18 Q. And what happens if the student leaves the  
19 room first?

20 A. Then a staff member will follow and call the  
21 office for someone to either come help in the classroom  
22 or to come and help with the student.

23 Q. Okay. Thank you. And my last follow-up on  
24 that, so when I say escort, does escort -- is that with  
25 hands or contact or no contact?

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1 A. We go for without contact mostly.

2 Q. And when is contact -- when does contact  
3 happen?

4 A. If a student that -- it would be a young  
5 student that contact would be used. We know that they  
6 run or they're pushing against someone. Someone may  
7 hold their hand to walk somewhere with them. We really  
8 try not to use any contact.

9 Q. Do you keep a record of times where it's  
10 necessary?

11 A. If we use a full restraint.

12 Q. What's a full restraint?

13 A. If a student has been aggressive or is being  
14 aggressive towards someone and a staff has to use the  
15 Mind Set techniques to restrain them.

16 Q. But that's the only -- so if there was someone  
17 guiding somebody by the elbow or something like that or  
18 holding them by the hand, that wouldn't be recorded.  
19 Only the full restraint?

20 A. Correct.

21 Q. Okay. Now I want to talk a little bit about  
22 the admissions process or enrollment process to  
23 Cedarwood.

24 Can you describe the process. And you've  
25 referenced parts of it before, but describe the process

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1 for which students come to receive services at  
2 Cedarwood.

3 A. In general, a student would be in special ed  
4 and having behavioral, severe behavioral issues, in  
5 that setting we like to go in and do consultation  
6 first, if possible.

7 If not, if things are more than -- have really  
8 escalated to a certain degree that the special ed  
9 director says, you know, we really need to have a  
10 meeting, so we will work with a special ed director and  
11 the specialty ed staff for the LEA to have a meeting on  
12 the student and then the IEP committee decides  
13 placement.

14 Q. And what is your role in that process?

15 A. I am -- I know what's going on. I don't  
16 attend those meetings unless someone has asked me to.

17 I will look over students' paperwork. We  
18 ensure that students have a behavioral intervention  
19 plan that's current and it's been followed, that -- we  
20 like to try to be sure everything has been tried at the  
21 school before students then are met on for GNETS.

22 But even sometimes in the meeting we may come  
23 with something and the IEP team decides not to send the  
24 student to Cedarwood.

25 Q. Do you come up with something at the meeting

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1 that has not been tried yet?

2 A. Yeah.

3 Q. You said at the beginning that you don't  
4 attend the meetings unless someone asks me. Does that  
5 generally include the IEP meetings?

6 A. Yes, the psych coordinators are the  
7 administrators that go do annual review meetings and  
8 other IEP meetings.

9 Q. So site coordinators. Are they your designees  
10 in that process?

11 A. Yes.

12 Q. And is that true for the admissions IEP  
13 meetings and other IEP meetings?

14 A. Yes.

15 Q. Okay. At what point in the process you  
16 described is the preferred packet prepared?

17 A. Usually when a special ed director either gets  
18 in touch with me or gets in touch with the psych  
19 coordinator, then we ask them to give us some  
20 information on the student by filling that out and  
21 sending us the information that they have on the  
22 student prior to the IEP meeting.

23 Q. Okay. Is there a step in where -- so you  
24 described you try to make sure everything has been  
25 tried at the school. Is that step you described,



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1 making sure it's been tried, done on the basis of the  
2 referral packet?

3 A. Yes.

4 Q. Okay. And then if it passes that sort of  
5 screening stage, then would it advance to the step of  
6 an IEP meeting?

7 A. Yes.

8 Q. So you mentioned that you want to make sure  
9 they have a current IEP and that it's been followed.  
10 Do you check to see whether there is an FBA?

11 A. We do, yes.

12 Q. Is it required?

13 A. It is part of that, yes. We don't have a  
14 specific FBA that has to be done. But, yeah, some type  
15 of functional behavioral assessment needed to be  
16 done.

17 Q. I'm not sure I understood that. So are there  
18 different kinds of FBAs?

19 A. There's different processes in an FBA or to  
20 carry out an FBA.

21 Q. So you're saying some FBA has to be done but  
22 it could be different for different students?

23 A. Yes.

24 Q. And is there a requirement there be progress  
25 monitoring data on the IEP implementation?

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1 A. Yes.

2 Q. If you want to check to make sure everything  
3 has been tried at the school, what would you look to  
4 see that has been tried?

5 A. That they have done an FBA, that they have a  
6 behavior intervention plan, that -- we look to see what  
7 types of interventions they've used, and that the  
8 special ed program in the local school system has been  
9 used to their full extent.

10 Q. What kinds of interventions would that  
11 include?

12 A. It may include counseling, different types of  
13 special ed services at the school or outside  
14 counseling, working with doctors if a student takes  
15 medication to ensure that they've been getting  
16 medication like they're supposed to, that type of  
17 thing.

18 Q. And is there another document in the process  
19 called a current eligibility report?

20 A. Just a current. There's a current eligibility  
21 for students. We want one that is current, not one  
22 that there has been one done after one.

23 Q. Is that where you told me on the report card  
24 that was that column that had EBD and OHI and things in  
25 it?

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1 A. Yes.

2 Q. And how recent would current be?

3 A. It's done within three years.

4 Q. Is that because of the reevaluations on the  
5 IEP schedule are required every three years?

6 A. Yes.

7 Q. Have you received guidance -- have you  
8 received guidance on what -- I'm sorry. Let me back  
9 up. Are you familiar with the GNETS rule?

10 A. Yes.

11 Q. I know you've been at Cedarwood a long time,  
12 so was there a GNETS rule in place when you started  
13 there?

14 A. I have no idea.

15 Q. Okay. Do you know when it was last amended?

16 A. It has been amended recently, but I don't --  
17 and by recently would have been probably ten years, but  
18 I'm really not certain what the date would be.

19 Q. When it was amended, did you understand that  
20 you had to change any of your practices in light of the  
21 amendment?

22 A. Yes.

23 Q. What did you change?

24 A. I believe that we changed the need for a FBA  
25 to be done prior. Most of the things that were in it

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1 we already did.

2 Q. Do you understand that to mean you already did  
3 it because they were required before or you already did  
4 that even though it wasn't part of the rule?

5 A. Just because it was best practices.

6 Q. So as far as you can remember, the addition  
7 for the FBA to be done prior was the only thing that  
8 changed in your practice with the amendment of the  
9 rule?

10 A. That was -- yes.

11 Q. Are you familiar with the -- I've been calling  
12 it a referral packet, but I think it has a different  
13 name. The student information -- student information  
14 packet?

15 A. Yes.

16 Q. And are you familiar with the flow chart, the  
17 GNETS flow chart?

18 A. Yes.

19 Q. And the guiding questions?

20 A. Yes.

21 Q. Do those documents together with the GNETS  
22 rule, do they form the basis for the enrollment  
23 determinations that you make for students referred for  
24 services at Cedarwood?

25 A. Those along within the IEP committee team

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1 meeting.

2 Q. Okay. Are there other documents that are used  
3 in the referral process?

4 A. No.

5 Q. So are the criteria set forth in the documents  
6 we just discussed, the information packet, the GNETS  
7 rules along with the guidance and the flow chart and  
8 the guiding questions, are those sort of the criteria  
9 that govern the enrollment decisions?

10 A. They are guidelines.

11 Q. All of them?

12 A. Well, the GNETS rule is actually the major  
13 guideline. The others are just -- well, the GNETS rule  
14 is the rule and these are just guidelines to help  
15 follow in the process.

16 Q. So the information packet, the flow chart, and  
17 the guiding questions are guidelines to help in the  
18 process?

19 A. Yes.

20 Q. Have you received any guidance on what the  
21 word intense means with respect to the rule requiring  
22 intense social emotional behavioral challenges?

23 A. No.

24 Q. Have you received any guidance about how to  
25 assess the severity, frequency, or duration of the

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1 challenges referred to in the rule?

2 A. No specific guidance, no.

3 Q. Have you received general guidance?

4 A. No.

5 Q. How about guidance about how to assess the  
6 services and supports provided in the general education  
7 settings?

8 A. No.

9 Q. And who reviews the sufficiency of the  
10 services that have been provided at the student's home  
11 school?

12 A. The Cedarwood coordinator and the special ed  
13 director would have conversations about it.

14 Q. And does the coordinator report to you or does  
15 the coordinator make a determination themselves?

16 A. In most parts the coordinator and I have  
17 conversations about it.

18 Q. And then what happens after the  
19 conversations?

20 A. Then they -- we might -- the coordinator  
21 themselves or I would talk to the special ed director  
22 and then they would -- it would still have a meeting,  
23 an IEP meeting, for the committee to make the  
24 decision.

25 Q. So you and the coordinator would together come

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1 to a decision about whether you think that enough had  
2 been done and convey that to the special director?

3 A. Yes. We would look at, to be sure, that  
4 everything has been done according to the rule, that we  
5 have everything there that we need, and the information  
6 that we need.

7 Q. And then you let the special ed director know  
8 that the packet was, like, complete basically and then  
9 the IEP meeting would be convened?

10 A. Yes.

11 Q. And you would not attend that part, correct?  
12 The coordinator would attend that meeting?

13 A. Right, usually. I'm not where I can't, but I  
14 generally do not.

15 Q. And so has a student ever referred to  
16 Cedarwood been denied enrollment because he or she had  
17 not received sufficient support at the home school?

18 A. I don't know.

19 Q. Do you have a sense of how many referrals are  
20 expected and how many are denied?

21 A. Well, we don't -- we wouldn't -- when you say  
22 denied, that makes it sound like someone is saying no,  
23 we can't even have a meeting on this.

24 We may say you need to do this or that, you  
25 know. You don't have an FBA to back up your behavior

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1 intervention plan or you've only had a behavior  
2 intervention plan for two weeks. That's insufficient  
3 data. Let's get some more data before we have an  
4 meeting, that type of thing.

5 Q. Okay. That sounds like what's referred to  
6 when the document has an action plan. Do you call it  
7 an action plan?

8 A. No, I don't.

9 Q. Okay. After you meet the IEP team can --  
10 would you use the word "accept" a referral to enroll a  
11 student?

12 A. We would write an IEP or amend the IEP to  
13 admit the segments to GNETS, and that in itself would  
14 be an acceptance, I guess. But we don't truly do an  
15 acceptance of that.

16 Q. Okay. You would take the steps necessary to  
17 enroll the student at Cedarwood?

18 A. Yes.

19 Q. Okay. And the other options include  
20 identifying what further steps would be appropriate  
21 before such an enrollment would be appropriate?

22 A. Yes.

23 Q. And is there ever anything more than that  
24 like, no, we don't get it or we won't consider.

25 THE REPORTER: I'm sorry, can you repeat the



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1 question?

2 BY MS. TAYLOE:

3 Q. So you would either say here's what further  
4 information we need or is there ever a time when you  
5 say we don't accept this referral or we won't consider  
6 the referral until these other steps have been taken?

7 A. Yes.

8 Q. The latter?

9 A. The latter, yes.

10 MR. NGUYEN: I'm sorry, Laura, can you pause  
11 for a second. Can we go off the record for just a  
12 second.

13 THE VIDEOGRAPHER: Off the record at 1:35.

14 (Recess.)

15 THE VIDEOGRAPHER: We are back on the record  
16 at 1:36.

17 BY MS. TAYLOE:

18 Q. Okay. So I used words that were not  
19 consistent with your practice, but do you have a sense  
20 of how many students who are referred to Cedarwood are  
21 enrolled in Cedarwood versus how many are referred back  
22 for additional measures before the referral would be  
23 considered again?

24 A. I really -- I don't know.

25 Q. So if a referral is made by a special

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1 education director and the referral is considered,  
2 let's say, not right yet, like not enough has been  
3 done, what additional supports are provided by the  
4 GNETS consultation teachers or otherwise from Cedarwood  
5 in order to ensure the success of the student in an  
6 illustrative setting?

7 A. We have done observations and given the  
8 teacher that's having a problem with the student or the  
9 team that's working with the student some suggestions  
10 on ways to handle the problems that are going on, the  
11 behavior problems.

12 We have gone in and worked with the staff at a  
13 school to do a functional behavior assessment and  
14 create a behavior intervention plan at another meeting  
15 and helped them to gather the data for that functional  
16 behavior assessment and through then the process of the  
17 behavior intervention plan, you know, keep data on  
18 that.

19 Q. Aside from those, do you also provide training  
20 to any teachers in the LEA schools?

21 A. We have. We have provided FBA training to  
22 several school systems prior to them getting staff  
23 trained. There's FBA training modules that are online  
24 now provided through Georgia State University that most  
25 school systems use and can use so that they can do

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1 FBAs. But we have offered services like that for  
2 training.

3 Q. And is this process followed for every student  
4 who enrolls in Cedarwood?

5 A. If a student is a move-in from another GNETS,  
6 then we serve them according to their current IEP.

7 Q. Can you tell me what move-in means?

8 A. Okay. So someone was in another school system  
9 not served by Cedarwood and they were being served by a  
10 GNETS program in that school system. And they moved to  
11 one of our counties, and their IEP says X number of  
12 segments at a GNETS program we follow that IEP.

13 Q. So there's no consideration to if the county  
14 the student moved to has additional supports that were  
15 not available in the prior district that that could be  
16 looked at before enrollment in GNETS -- in Cedarwood?

17 A. No, we to look at that also. Yes.

18 Q. How would you look at that if the referral  
19 process isn't used?

20 A. Well, we would -- when you have a move-in  
21 student and the school system wants to do like a  
22 transfer IEP, so they take ownership then of the IEP.

23 We might look at what was going on with the  
24 student in the other GNETS, and I might call or the  
25 coordinator of the site would call the other GNETS to

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1 talk to their coordinator or director on what was going  
2 on with the student.

3 And then they might not be like full-time  
4 GNETS or, you know, it just depends on the situation.  
5 Every situation is different. But we do generally do a  
6 transfer IEP meeting so that we can gather information  
7 on the student and what was going on.

8 Q. So the default placement would be in Cedarwood  
9 if they were in a different GNETS program before  
10 moving, and then there might be some flexibility  
11 afterwards to reduce it if a subsequent IEP meeting  
12 suggests otherwise?

13 A. Yes.

14 Q. So is a move-in situation the only time this  
15 referral process we've been discussing would not be  
16 used in enrolling a student?

17 A. There have been situations where a student's  
18 behavior is very severe and where we've taken students  
19 without checking all of the boxes in order to get them  
20 in. We don't do emergency placements, but it would be  
21 almost an emergency-type placement.

22 And then while we had them, we would make sure  
23 everything else had been done. But all students have  
24 an IEP and are served in special ed before we would  
25 ever even look at them.

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1 Q. How often would you say these kinds of  
2 nonemergent but nonstandard admissions happen?

3 A. Very seldom.

4 Q. Does anybody in the Georgia Department of  
5 Education have a role to play in these decisions, these  
6 admissions or enrollment decisions?

7 A. No.

8 Q. Do they have a role in transferring records  
9 from school to school or program to program?

10 A. No.

11 Q. I'm going to mark as Exhibit 253 (sic) a  
12 document from the State GA00013594.

13 MS. HERNANDEZ: I did have one question for  
14 you, Laura. It cut out. You said, "Does anyone from  
15 the blank participate in." It was your last question  
16 and I didn't hear it, if either you or the court  
17 reporter can read that back.

18 MS. TAYLOE: Georgia Department of  
19 Education.

20 MS. HERNANDEZ: Gotcha. Okay. Thank you.

21 (Plaintiff Exhibit 254 marked.)

22 BY MS. TAYLOE:

23 Q. Okay. And I'm giving you control,  
24 Ms. Braddock.

25 A. Okay. You would think by now I would have

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1     figured out how to do it.

2           Q.     I'm the same pre-tech generation you are, so  
3     no judgment from me. I think if you scroll the control  
4     bar on the right, it works better.

5           A.     The problem is when I get all the way on the  
6     right to scroll, I can't see what's on the left and  
7     then have to get back down there. So is this -- okay,  
8     here we go.

9           Q.     There might be a way to fit it to screen, too,  
10    if it's not all on one screen for you.

11          A.     Let me try. There we go. Okay. All right.  
12    What's your question?

13          Q.     Do you recognize this document?

14          A.     Yes, I do.

15          Q.     Can you -- for the record, it involves an  
16    email exchange between Whitney Braddock and Vicky  
17    Cleveland.

18                 And your message to Vicky is, "I sent a  
19    request for a student transfer in i-Ready in the portal  
20    earlier this week. I was just double-checking to be  
21    sure that you knew the request was there. I have  
22    teachers asking about the student."

23                 Is that accurate what it says?

24          A.     Yes, it is.

25          Q.     Can you explain what was happening here?

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1 A. Okay. A student was a move-in from another  
2 GNETS to our program. And we used the i-Ready program  
3 for reading and math remediation.

4 And if a student was at another GNETS and they  
5 were using i-Ready, when they moved to us so that they  
6 don't -- so the continuity of using this program, the  
7 DOE actually has the ability to transfer students from  
8 one GNETS to another within this program, the i-Ready  
9 program.

10 Q. Okay. What did you mean teachers asking about  
11 the student?

12 A. Well, I had teachers wanting to know when the  
13 student can start using i-Ready because he hadn't been  
14 transferred into our i-Ready program yet.

15 Q. So he was already in Cedarwood classes --

16 A. Yes.

17 Q. -- but not able to access --

18 A. i-Ready. I'm sorry, I'm talking over you.

19 Q. And is that the only circumstances in which  
20 the Department of Education would get involved in a  
21 transfer to access records?

22 A. Yeah, for the i-Ready records. Yes.

23 Q. How many new students would you say are  
24 enrolled in Cedarwood on average each year?

25 A. It really depends on the year. It changed and

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1 there's not a consistent answer that I can really give  
2 you.

3 Q. Okay. Do you have a kind of range?

4 A. 10 to 20 maybe.

5 Q. 10 to 20 new students?

6 A. New or move-in students, and I may be high.

7 Q. Would that be more consistent with before the  
8 declining enrollment you've been speaking of?

9 A. Probably.

10 Q. Let me ask it a different way?

11 A. Okay.

12 Q. You provided us some charts that were called  
13 intake charts. Would intake mean -- what does intake  
14 mean?

15 A. Well, it just means that the school has  
16 contacted us for some type of service with this child.  
17 Either they've moved in from another GNETS program or  
18 they're doing the referral or they want us to help out  
19 with observations or functional behavior assessments or  
20 that type of thing. It's not the classic definition of  
21 intake.

22 Q. Okay. So it's not necessarily students who  
23 are enrolled. It's students -- sorry, students that  
24 LEAs have reached out to you about?

25 A. Yes.



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1 Q. Okay. I'm going to ask to be marked as  
2 Exhibit 255, an Excel spreadsheet that was produced as  
3 FY21 student info chart, and its reference number is  
4 000146.

5 (Plaintiff Exhibit 255 marked.)

6 BY MS. TAYLOE:

7 Q. And this is not redacted because there does  
8 not appear to be any personally identifiable  
9 information in it, but it is a very large spreadsheet.  
10 So I'm definitely going to give you control and you can  
11 zoom and enlarge it if you wish.

12 Can you see this document?

13 A. I can. I want to change my settings here.

14 (Witness reviewing document.)

15 THE WITNESS: Okay.

16 BY MS. TAYLOE:

17 Q. Are you familiar with this document?

18 A. Yes and no.

19 Q. Can you explain that?

20 A. I know it's a document that I submitted and  
21 I'm sitting here trying to figure out what its use was  
22 for, and I don't recall.

23 Q. Is it something that your coordinators may  
24 have prepared in response?

25 A. It's something that -- it may be something

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1 actually that the Georgia Department of Education asked  
2 for us to complete for them.

3 Q. Do you remember when it was completed?

4 A. I don't.

5 Q. Do you know what they might have -- did they  
6 often ask you to complete documents like this?

7 A. No. And if you want my speculation is that it  
8 was in preparation for this lawsuit.

9 Q. Okay. When you produced it, it says FY21's  
10 student info chart. And we've been trying to figure  
11 out calendar years and fiscal years for a while on our  
12 end. If it says FY21 that would cover --

13 A. 2020/2021.

14 Q. So fiscal year 2021 is 2020/2021?

15 MR. NGUYEN: School year.

16 THE WITNESS: That school year, yes. That  
17 school year.

18 BY MS. TAYLOE:

19 Q. Okay.

20 A. Okay. So as I sit here looking at this, the  
21 Georgia DOE, Vicky Cleveland, sent GNETS' directors a  
22 Google form to fill out on each student.

23 And this was the -- once all the Google forms  
24 had been put together, this was all the information  
25 that I submitted to them in an Excel form. It probably

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1 came out as a Google Sheet and then I saved it on my  
2 computer as a Google form.

3 Q. So this is a compilation of all the forms you  
4 completed on individual students?

5 A. Yes.

6 Q. Okay. So the first thing I want to confirm is  
7 that the codes here are the same ones as we described  
8 before. Like, EBD is still Emotional Behavioral  
9 Disability?

10 A. Yes.

11 Q. Okay. ASD is Autism Spectrum Disorder?

12 A. Yes.

13 Q. There's a list here as primary eligibility and  
14 there's a separate column for secondary eligibility and  
15 also a column for medical diagnosis. Can you explain  
16 the differences among them?

17 A. So primary eligibility would be the first  
18 eligibility for a student, the one that primarily needs  
19 to be addressed. Some students may have a secondary  
20 eligibility also.

21 And then a medical diagnosis would be if there  
22 was some type of medical diagnosis that we knew of for  
23 this -- for each student.

24 Q. Okay. So why are epilepsy and traumatic brain  
25 injury considered eligibilities?

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1 A. I know that TBI is an area of eligibility. I  
2 don't think that epilepsy is an eligibility category.

3 Q. Okay. You have control I think. One of them  
4 has eligibility listed with no secondary eligibility.

5 A. Most of the students don't necessarily have a  
6 secondary eligibility. You might have a student that  
7 has a primary eligibility of EBD and then possibly  
8 speech as a secondary eligibility.

9 It could be something else, but not all of our  
10 students, and not many of them I don't believe, have  
11 secondary eligibility.

12 Q. Okay. So I know we talked before about the  
13 sites. There's some classrooms that are primarily for  
14 students with intellectual disability and/or autism  
15 spectrum disorder. Is that correct?

16 A. Yes.

17 Q. Other than that, are there any other -- is  
18 there any other differentiation made for instruction  
19 for students with such disparate eligibilities?

20 A. Their instruction is based on their needs  
21 identified and their IEP and their goals and objectives  
22 with that and then that's what the IEP looks at and  
23 then whatever the gray-level standards that they should  
24 be taught for that also.

25 Q. So just to be clear, then there could be

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1 students in one class, say, at the middle school range  
2 of classes that includes some students with severe  
3 developmental delays and others with no developmental  
4 delays both because they have behavioral challenges?

5 A. There could be but not in a middle school  
6 class with SDD. SDD is changed to another eligibility  
7 area I think by their ninth birthday, I think.

8 Q. Okay. I didn't know that. But there could be  
9 an element? Is SDD an elementary formal designation  
10 then?

11 A. Yes.

12 Q. Okay. So you could have an elementary class  
13 that has students with SDD and students who are on  
14 grade level but have behavioral challenges in the same  
15 class?

16 A. Yes.

17 Q. Okay. All right. I'd like to take one  
18 student as an example. Can you scroll to Row 14?

19 A. I'll give it a go. I don't know where I am  
20 yet. I may have found the magic bullet with this.  
21 Okay, 14; is that correct?

22 Q. That's correct. Okay. And so -- you can't  
23 see the headings on it, but Row G is -- Column G is the  
24 primary eligibility. Can you see what his primary --  
25 his or her, I don't know -- the student's primary

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1 eligibility is?

2 A. It looks like autism.

3 Q. And can you read what's in Column F about  
4 behaviors?

5 A. Student moved with his family to Tattnall  
6 County from out of state in August 2019. He had  
7 previously been served at a high school that had a  
8 program for students with autism.

9 Q. Can you explain to me what the basis for this  
10 student's enrollment in GNETS is?

11 A. The school that he moved to in Tattnall  
12 County, that system was not able to -- his behaviors  
13 were very severe and the school that he had been at had  
14 a program for students with autism but Tattnall County  
15 did not.

16 Q. So even though severe behaviors are listed in  
17 some of the other students' entries, it's not listed in  
18 this one, but you're saying that was the basis for his  
19 enrollment?

20 A. That's what that says and, yes, that's what  
21 I'm going to go with. I don't know what student it  
22 is.

23 Q. I'm sorry, it sounds like you did know when  
24 you were saying the school he moved in and his  
25 behaviors?

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1 A. That's just what I was drawing from what this  
2 is about the student moving.

3 Q. Okay.

4 A. What I can tell you is that our students with  
5 autism all exhibit severe behaviors.

6 Q. Can you scroll across to Column M, which is  
7 about the FBA, the existence of a FBA.

8 A. So I'm not certain what column it is.

9 Q. So we're still on Row 14, Column M.

10 A. So is it the one after where it says special  
11 program for students with autism out of state  
12 self-contained?

13 Q. Yes.

14 A. Okay.

15 Q. So this column -- if you want me to take  
16 control back, I can scroll up and show you that's the  
17 column for FBA and it says no. So the student did not  
18 have an FBA on record when he was enrolled?

19 A. That is correct.

20 Q. And Column Q has the F -- I'm sorry, the VIP  
21 date, which is almost 19 months prior to his  
22 enrollment. Is that correct?

23 A. Yes. That would have come from the school  
24 that he was at prior.

25 Q. Okay. So how is it that a student with no

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1 documented behavior issues and no FBA and an out of  
2 date BIP moved from out of state would be enrolled in  
3 Cedarwood?

4 A. Because I don't know exactly what this -- who  
5 this student was or what was going on, it is my  
6 assumption that this -- when this student's parent  
7 registered them in Tattnall County schools, they either  
8 told the school system that this child had severe  
9 problems or when Tattnall County School Special Ed  
10 Director or her designee got in touch with the school  
11 that the child was coming from, they told them that  
12 this child had severe behavior problems. And that  
13 would be where that would come from.

14 Q. So there would be no further, you know,  
15 referral process or review of the behaviors or the  
16 ability of the local school to meet those needs?

17 A. Yeah, what I would say is that they -- my  
18 guess is if I knew, you know, what this was, was that  
19 they reviewed the records and then looked at  
20 conversations with the parent and then made that  
21 decision at an IEP meeting that a student would then be  
22 served by Cedarwood.

23 Q. When you say they reviewed the records, who  
24 are you saying?

25 A. That would have been the special ed director.



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1 Maybe the special ed person at Tattnall County High  
2 School and then the Cedarwood coordinator.

3 Q. Okay. So they would review the parents'  
4 reports of behaviors and they can determine  
5 recommendation based on that?

6 A. They would also review the records that they  
7 got from the school that the child was transferring  
8 from.

9 Q. And would all that be presented to the IEP  
10 team?

11 A. Yes.

12 Q. And your coordinator would be presumably on  
13 the meeting when that was considered?

14 A. Would definitely have been there, yes.

15 Q. Okay. And would you have any expectations  
16 about whether your coordinator would find that  
17 information sufficient basis for enrollment?

18 A. I wouldn't have any questions about that, no.  
19 And my guess is that the coordinator or the special ed  
20 director, one, talked to me about it prior to the  
21 placement or the meeting that they had.

22 Q. And you would have approved that, finding it  
23 consistent with the GNETS rule?

24 A. I would have approved to go along with the IEP  
25 committee and for what would best serve the

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1 institute.

2 Q. Okay. In this chart, there are 56 student  
3 entries. Would it surprise you to learn that 21 of  
4 them have a "no" in the FBA column?

5 A. Yes, that would surprise me.

6 Q. Why?

7 A. Well, that's one of the things that we look  
8 for. But the question may have been did we have the  
9 FBA in hand.

10 We might have documentation that an FBA had  
11 been done, but we didn't get that documentation from  
12 the school, so that's why there would be a no, there.

13 But it would surprise me that if there was  
14 absolutely no FBA ever done, it's just that we didn't  
15 have it.

16 Q. So if there was an FBA that had been done but  
17 you didn't have it in hand, how would a determination  
18 be made about its, you know, efficacy?

19 A. There could have been a document attached to  
20 the behavior intervention plan that said was an FBA  
21 been done, click yes. And it would have, you know, it  
22 would have been marked as yes and there could have even  
23 been a date there as to when it would have been done.  
24 Just the documentation of the FBA we may not have had  
25 in hand.

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1 THE VIDEOGRAPHER: And, Laura, I've got about  
2 five minutes.

3 MS. TAYLOE: I'm sorry?

4 THE VIDEOGRAPHER: I've got about five minutes  
5 on the Media 2. I apologize.

6 BY MS. TAYLOE:

7 Q. Okay. So in that case you would feel  
8 comfortable relying on the summary or whatever  
9 documentation you've got from some intermediary about  
10 the contents of the required documentation?

11 A. Yes.

12 Q. Okay. And would it also surprise you that of  
13 the 21 who had no FBA, five of them also did not have a  
14 behavior intervention plan in place?

15 A. Yes. That would definitely surprise me.

16 Q. Do you have any idea why that might be?

17 A. I do not. But what I can tell you is that  
18 when their IEP was rewritten for them to come to  
19 Cedarwood, a behavior intervention plan would have been  
20 written.

21 Q. So they may not have had one to begin at  
22 GNETS, but they would have gotten one at some point?

23 A. Yes. And if they didn't have an FBA, they  
24 would have gotten an FBA also.

25 Q. What's the time frame? How long would it take

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1 after enrollment for an FBA as a VIP could be in place?

2 A. That is difficult to say. There are some FBA  
3 that we collect. It just depends on the behaviors that  
4 we're looking at and how they show themselves.

5 Q. Do you think some behaviors are less frequent  
6 and some may be harder to capture?

7 A. Possibly. There's also what could be known as  
8 the honeymoon period where when students come in, you  
9 don't see the behaviors that you saw for about a week.  
10 And so we might start an FBA and have to then go back  
11 and do it again. So that may take a little longer.

12 Q. Okay. So the last question on this and then  
13 we'll stop. When this document was compiled, did  
14 anyone review it to, you know, check for compliance or  
15 was it just passed on to DOE without review?

16 A. I had the staff at each site to do a form that  
17 I could then use to input this into that. So I'm the  
18 one that input it, so I saw all of those things.

19 It most likely spurred conversations about the  
20 reasoning why each student, the answer would have been  
21 for those. But at this point I couldn't tell you what.  
22 I don't remember the conversation.

23 Q. Okay. All right. If you want to take a break  
24 for the recording, we can stop now.

25 THE VIDEOGRAPHER: This is the end of Media 2

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1 in the deposition of Director Whitney Braddock. We are  
2 off the record at 2:16.

3 (Recess.)

4 THE VIDEOGRAPHER: This is the beginning of  
5 Media 3 in the deposition of Director Whitney Braddock.  
6 We are back on the record at 2:22.

7 BY MS. TAYLOE:

8 Q. Okay. I kind of hurried through the last  
9 little bit because of the recording, so I want to back  
10 up just a minute.

11 What did Ms. Cleveland tell you about, tell  
12 you meaning all the GNETS instructors, when she asked  
13 for the forms to be completed?

14 A. I don't really remember, just that we needed  
15 to complete them by a certain date. But I don't  
16 remember the explanation that she gave.

17 Q. Do you know what she did with them after they  
18 were sent back?

19 A. I don't.

20 Q. Did she reach out for any further  
21 clarification or further information?

22 A. Not that I can recall.

23 Q. What did you tell the folks who were gathering  
24 the data for you? What did you tell them it was for?

25 A. I needed this for Vicky.

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1 Q. That's fine. Okay. And I asked about  
2 clarification. But to be complete, did she make any  
3 requests in terms of doing something differently or  
4 changes or anything else after receiving the  
5 information?

6 A. I don't recall that.

7 Q. Okay. Now I'm going to move on to the exit  
8 side of the process. So what are Cedarwood's goals  
9 with respect to exiting students?

10 A. We want to exit students as soon as they can  
11 possibly be successful back in a less restrictive  
12 environment.

13 Q. And do you conduct any analysis about whether  
14 these goals are met?

15 A. We keep data on their IEP goals and look at  
16 that. We look at their behaviors, any discipline  
17 referrals, attendance, if a student was having  
18 attendance problems. We look at that to see if that's  
19 improved.

20 We just look for around overall improvement  
21 and look at the data based on, you know, how they're  
22 doing on their behavior goals, if they're meeting them.

23 Q. And you said earlier that you don't track the  
24 length of stay. Why is that?

25 A. Just never have.

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1 Q. How could you meet your goal if having  
2 students exit as soon as they could possibly be  
3 successful in the LRE without at least tracking how  
4 long they've been in GNETS?

5 A. I'm not -- to me, I don't believe that the two  
6 are really connected because if you were at GNETS for a  
7 nine-week period and we look at those goals at the end  
8 of that nine-week period and you've met all your goals,  
9 then you're ready to go back or start a transition  
10 back.

11 But if you have never met any of those goals  
12 and your behaviors and your situation has either  
13 declined or stayed the same, then you're generally not  
14 ready to go back. But we look at placement every year  
15 at an annual review meeting with a committee.

16 Q. So there's no difference in how they're  
17 evaluated. Do you look at the student after a year to  
18 see whether they've met their goals in the same way as  
19 you look at a student who's been there for nine years  
20 to see if they've met their goals?

21 A. Each nine weeks we look at the data that we've  
22 collected and report that data back to their schools,  
23 their parents, and the special ed director.

24 Q. Okay. I understand that. But I'm asking if  
25 the criteria might not be, you know, worthy of

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reevaluation if a student hasn't been able to meet goals for nine or ten years, wouldn't that prompt a discussion about whether something different should be tried or the goals are realistic or not?

A. Well, the goals may actually change throughout as we look at -- behavior goals would change if different behaviors came up and we did an FBA or changed a behavior intervention plan for those goals or looked at other goals that are interfering behaviors.

But just because a student came in with some certain X, Y, Z goal for behavior and they have not had that same goal for ten years, as children age there's going to be differences and needs for change, which are done during the IEP meeting.

Q. Okay. Well, that's a good time for me to ask sort of more generally what are the exit or transition criteria for students?

A. Each student is different so we look at behavior goals when they are referred, the referring behaviors, and generally start with that and look at -- a lot of times it's did the student meet this goal 80 percent of the time.

It varies for different students, but in general we usually look at about 80 percent of the time of success on a goal.



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1 Q. Okay. So I understand that you're saying how  
2 behaviors would change over time, but I understand --  
3 how would revising the goals be communicated to the  
4 student so it doesn't feel like moving the goalpost?

5 Do you know what I mean?

6 A. The students know what their goals are, and  
7 they know that we keep data on those goals. And  
8 depending on the age and the ability and the  
9 understanding of a student, we would -- you know, the  
10 teachers go over their goals with them and talk to them  
11 about how they're doing and what they need to do with  
12 it. The counselor may do that also.

13 Q. So have you encountered students who have  
14 successfully remediate one undesirable or problematic  
15 behavior but replace it with a different one and then  
16 have them set a new goal?

17 A. That could happen, yes.

18 Q. Okay. So you said you do this every year.  
19 Who assesses when a student is ready to transition to a  
20 less restrictive setting?

21 A. The teachers at the school and the  
22 coordinator.

23 Q. And is that part of an IEP meeting or is that  
24 a separate meeting?

25 A. It's not even really a meeting, but they may

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1 be like, hey, student X is really improving on this,  
2 that, or the other. Here's what their goals are. And  
3 then an IEP meeting would be scheduled for it to  
4 discuss that.

5 Q. Okay. I'm asking about the conversation about  
6 when they're ready to transition to a less restrictive  
7 setting. That's not even a meeting?

8 A. No, it's not a meeting. You have -- you would  
9 call an IEP meeting to discuss it further down, you  
10 know, what the appropriate thing would -- placement  
11 would be.

12 Q. So you're saying that the goals might be  
13 revised in between IEP meeting times. But the question  
14 about transitioning, would that be raised separately  
15 also or only at the time of the IEP meeting?

16 A. The goals generally are not changed just  
17 arbitrarily, and we would usually have some type of a  
18 meeting if we have done another FBA and need to do  
19 another behavior intervention plan.

20 So it would be a committee meeting to make  
21 changes to the behavior intervention plan and the IEP.  
22 And then like a parent could come in and say, look, my  
23 child's behaviors are doing better. When are we going  
24 to, you know, I want a meeting.

25 And so we'll plan a meeting and then discuss

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1 the data at the meeting and make those decisions based  
2 on that.

3 Q. Okay. So is data collected towards such a  
4 determination all the time or only at periodic  
5 intervals?

6 A. Data is collected every day.

7 Q. So any time somebody thought this child might  
8 be ready for transition, staff, teachers or the  
9 coordinator, somebody could look back over data and see  
10 whether, in fact, the behaviors are improving or  
11 whether they're meeting the 80 percent target?

12 A. Yes.

13 Q. And so the only part I'm still not  
14 understanding, though, is there a structured time to  
15 consider that? Like say, okay, now I'm going to talk  
16 about this student, whether this student is ready to  
17 move to a less restrictive setting.

18 A. At the end of each grading period, so that  
19 would be each quarter, the data that's collected is put  
20 together and a report is put out showing how well each  
21 student has done on each of their goals.

22 So I suppose the answer to your question is  
23 that quarterly at grade time it's looked at. But also  
24 the answer to your question is there doesn't have to be  
25 a set time.

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1 Q. Well, so at quarterly the information is  
2 compiled, but there's not a process by which somebody  
3 looks at it and says, okay, these five students have,  
4 you know, met the 80 percent target; we should talk  
5 about transitioning them?

6 A. There's not a specific meeting that happens  
7 for that. When you only have three or four classrooms,  
8 you don't necessarily have to have a meeting with the  
9 small number of students and the small number of staff  
10 that we deal with that we have.

11 Q. Right. I understand there's not a meeting,  
12 but is there a person who's tasked with looking over  
13 that data to see if some students are meeting those  
14 targets?

15 A. The coordinator at each site.

16 Q. Coordinator. Okay. And do they do that every  
17 quarter?

18 A. Yes.

19 Q. And do they report to you?

20 A. If they need to. They don't necessarily  
21 report to me on each student. But if they have  
22 questions about it, then they do.

23 Q. So there's no documentation that shows that  
24 this has been reviewed and how students are doing or  
25 which ones are ready to transition or ready for

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1 consideration of transitioning?

2 A. No.

3 Q. And I hate to come back to this, but I'm just  
4 trying to reconcile. Are you saying it's a small  
5 school and there's not that many students and all this  
6 is looked at quarterly.

7 But even with that you aren't able to give me  
8 an estimate of what you think the longest time a  
9 student has been at Cedarwood is?

10 A. I just don't know.

11 Q. Okay. All right. I want to ask a little bit  
12 about the continuum of services. Do you know what I  
13 mean when I say the continuum of services?

14 A. Yes.

15 Q. Can you tell me specifically which supports or  
16 services Cedarwood provides to children still enrolled  
17 in the participating LEAs?

18 A. Okay. I don't really understand your  
19 question.

20 Q. We talked about it a little bit. I just want  
21 to explore sort of -- we talked about observations  
22 maybe in giving some advice to teachers about ways to  
23 handle behaviors.

24 But are there other services that Cedarwood  
25 staff do for students in the LEAs?

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1 A. No, not nothing that's, you know, every  
2 student gets this, no.

3 Q. How about exit students?

4 A. Right.

5 Q. What do they get?

6 A. They get follow through and if there is a  
7 need, then we will go and try to meet the need with the  
8 staff at the LEA.

9 Q. And how would you -- is there a way to  
10 estimate the ratio of staff time on helping students  
11 stay in the general education setting versus the amount  
12 of time GNETS' staff spends on-site?

13 A. I don't know a ratio, no.

14 Q. When I use that sort of shorthand with the  
15 consultative teachers who we talked about before, they  
16 spend time in the general education settings when  
17 they're not doing substitution work.

18 Is that correct?

19 A. No.

20 Q. No? Oh, what did I get wrong?

21 A. You asked did the consultant teacher spend  
22 time in the generalized setting doing substitution  
23 work? No, they don't.

24 Q. No, but they're in the general substitution  
25 setting except for when they're doing substitution work

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1 at the sites?

2 A. No. They may be -- it just depends on the  
3 need. If a student -- if our students that are back in  
4 the general education settings are not having any  
5 problems and the school has not asked for any help,  
6 then they are not -- they are doing that.

7 Q. Okay. So in those cases, they would be  
8 working with students at Lyons or Statesboro?

9 A. Yes, yes.

10 Q. Okay. Is there anybody besides the consultant  
11 teachers who would provide services in the general  
12 education setting?

13 A. The coordinators do and have, and some of our  
14 teachers that may know the student or have experience  
15 may go to the school to do that also.

16 Q. So as needed the consultative -- I'm sorry --  
17 the consultant teachers, the coordinators, and  
18 sometimes teachers might spend time in a general  
19 setting. But the rest of instructional and therapeutic  
20 support would be provided on-site?

21 A. Yes.

22 Q. Okay. And so I want to go through the level  
23 of the continuum and ask whether Cedarwood offers  
24 them?

25 A. Okay.

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1 Q. Do you offer school -- I'm sorry, do you offer  
2 services for students in a gen ed setting in his own  
3 school?

4 A. Consultative services but no direct  
5 services.

6 Q. Okay. How about pull-out for part of the day.

7 A. Yes. We have students that are part with  
8 Cedarwood and part in their LEA.

9 Q. Well, that's different. I'm going by the  
10 GNETS rule. So Section 2 says -- I think this means  
11 if my understanding -- and correct me if this is  
12 wrong -- is the first level in the continuum is sort of  
13 a push-in into a Gen-Ed class where services are being  
14 provided in the Gen-Ed class.

15 And the second one sounds like you're still in  
16 the Gen-Ed school but you're pulling students out to  
17 provide them with services. Does Cedarwood do that?

18 A. No, we don't.

19 Q. Okay.

20 A. We're site-based programs, so we're not based  
21 in a school.

22 Q. But when you go -- when your staff go to  
23 Gen-Ed settings to provide support, do they do it in  
24 the -- is it a push-in model where they're in the  
25 classroom with the students or do they pull the



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1 students who require extra support out of the  
2 classroom?

3 A. It could be either.

4 Q. Okay. And then do you offer services for  
5 GNETS classroom for part of the day?

6 A. Yes.

7 Q. Do you understand what the term GNETS  
8 classroom is?

9 A. Well, we have students -- again, my  
10 interpretation of that is that students are with  
11 Cedarwood for part of the day and then returned to  
12 their LEA for another part of the day.

13 Q. Okay. I'm sorry, I should have gone through  
14 these terms first then. As the GNETS rule describes  
15 the classroom, it means a self-contained classroom in a  
16 Gen-Ed setting for GNETS students.

17 A. Right. We don't have that.

18 Q. Okay. Continuum No. 3, GNETS classroom for  
19 part of the day Cedarwood does not offer that?

20 A. No.

21 Q. And so No. 4, GNETS classroom for the full  
22 day, does Cedarwood offer that?

23 A. Yes.

24 Q. The classroom member is a self-contained class  
25 in a public -- in a Gen-Ed setting?

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1 A. No, then we don't offer that. No.

2 Q. Okay. Does Cedarwood offer GNETS center for  
3 part of the day?

4 A. Yes.

5 Q. And No. 6 is GNETS center for the full day?

6 A. Yes.

7 Q. Okay. So since I didn't define the terms in  
8 advance and I kind of muddled it, so you offer push-in  
9 services in the Gen-Ed setting. That's one in the  
10 continuum. And you offer the GNETS center for part of  
11 the day and GNETS center for the full day in the other  
12 continuum.

13 Is that correct?

14 A. Yes.

15 Q. And you don't offer the classroom or the  
16 pull-out options in the middle of a continuum; is that  
17 correct?

18 A. That's correct.

19 Q. Okay.

20 A. The first one that you said is not something  
21 that is actually put into the IEP and given segments  
22 though.

23 Q. I understand. It's to help students remain in  
24 the Gen-Ed setting?

25 A. Yes.

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1 Q. Yes. And those are the ones we talked about  
2 before, right, the observation to them with the FBA and  
3 data collection in all those services?

4 A. Uh-huh.

5 Q. Okay. All right. Now, I want to talk a  
6 little bit about the therapeutic services offered at  
7 Cedarwood. And we've talked about some of these so  
8 it's going to take me a little bit of time going  
9 through my notes because we've covered some things  
10 already.

11 Some of the ones you've identified already are  
12 Mind Set and LSCI and you've talked about PBIS. Are  
13 there other services besides PBIS, Mindset, and LSCI  
14 that are the therapeutic services besides those that  
15 are offered at Cedarwood?

16 A. We have a counselor.

17 Q. And how many students? I'll start with that.  
18 How many of Cedarwood students do you think have  
19 permission to and meet with the counselor?

20 A. I would say approximately 75 percent.

21 Q. And so how frequently on average would they  
22 meet with a counselor?

23 A. It depends on the need of the students. So  
24 once a week, once every two weeks. If the counselor --  
25 if a student needs a counselor and they want to see the

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1 counselor, they can ask.

2 And then even if, like, on when our counselor  
3 is at our Lyons site and a Statesboro student really  
4 needed to talk to the counselor, we can do like a Zoom  
5 meeting or that kind of thing to allow them to talk or  
6 use the phone.

7 The counselor sets his schedule himself based  
8 on students who are good counseling candidates and  
9 their needs.

10 Q. When you said 75 percent -- I asked a compound  
11 question, so I'm going to try to clear up my question.  
12 I asked had permission to and see the counselor and you  
13 said 75 percent.

14 Are there students who have permission who  
15 don't see the counselor?

16 A. There are students who have permission and  
17 will refuse to see the counselor.

18 Q. Oh, how does that happen?

19 A. They don't -- they don't want to talk. They  
20 don't want to be a part of it.

21 Q. And how does that -- so how would you break  
22 out, in terms of that 75 percent, how many have  
23 permission to see the counselor and how many actually  
24 see the counselor?

25 A. I would say about 75 percent of our students

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1 actually see the counselor.

2 Q. And something somewhat smaller than that have  
3 permission?

4 A. Yeah. Most of the students do have  
5 permission. There are some parents who won't give  
6 permission because they see a different counselor.  
7 There are also parents who just absolutely refuse to  
8 sign for their child to see a counselor.

9 Q. Okay. So of the 25 or so percent who aren't  
10 seeing Cedarwood's counselor, some are seeing a  
11 different counselor and some aren't getting any  
12 counseling?

13 A. Yes.

14 Q. Okay. So LSCI, Mind Set, PBIS counseling.  
15 Are there other -- oh, when you said 75 percent see the  
16 counselor, is that -- that's, you said, Cedarwood's  
17 counselor, right?

18 A. Yes.

19 Q. So others -- students are seeing other  
20 counselor. Some of them are seeing them on-site and  
21 some are seeing them off-site we saw from the other  
22 document. Correct?

23 A. Yes.

24 Q. But that's all within the other 25 percent?

25 A. Yes.

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1 Q. Okay.

2 A. I mean, some may see all three.

3 Q. Is there any coordination, if that's the case,  
4 do you know if -- is it Mr. Mullis --

5 A. Mullis.

6 Q. -- Mr. Mullis have contact with the other  
7 counselors or know when they're meeting with other  
8 counselors?

9 A. Some of them he does. Some he would not, but  
10 ones that he would come in contact with when they came  
11 to the school or if it was virtual, he may, you know,  
12 if he was there when that was going on would step in  
13 and meet them. There's no formal type of coordination  
14 between them.

15 Q. Okay. I want to ask you about some other  
16 things that are mentioned in the grant application  
17 because I don't know if they're therapeutic services or  
18 what they are. And you can let me know what they are.  
19 There's something with the Care Partners?

20 A. Okay. So Care Partners is an agency. It's  
21 called an IFFY service, Intensive Family -- I don't  
22 know. It's generally like if a student has been in a  
23 hospitalization, they may be referred to Care Partners.

24 But we actually have worked with Care Partners  
25 for years and they will -- they do their own -- we'll

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1 refer them to students for Care Partners, and then they  
2 do the intake with the parent and they see the student  
3 at Cedarwood, but they do their own billing through  
4 insurance and Medicaid to see students.

5 They also have a family person that meets with  
6 families and they do doctor's visits through telemeds,  
7 and a lot of times their family person will arrange to  
8 have the parent come in to Cedarwood to do the doctor's  
9 visit with the student right there at school.

10 And then the doctor does medications or  
11 whatever else they need to do to prescribe that. So we  
12 facilitate that and that's what Care Partners is.

13 Q. Okay. So it's counseling, it sounds like,  
14 with some medication management and some other family  
15 services?

16 A. Yes, yes.

17 Q. Okay. And so is that something you have --  
18 it's funded through the family, so you provide this  
19 base for it, but you don't --

20 A. Right.

21 Q. -- you don't need to organize it or  
22 orchestrate it or anything?

23 A. No. It doesn't cost us anything, and we  
24 provide space and cooperation with them.

25 Q. Okay. And then there's reference to other

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1 Pineland Mental Health and other corps providers. It  
2 also mentions IFFY again, which I don't know what it  
3 means or stands for either.

4 A. It's intensive family some kind of -- I don't  
5 know. But Pineland Mental Health is the Department of  
6 DBHDD.

7 Q. DBHDD.

8 A. There you go. That's who Pineland is.

9 Q. So they're contracted through DBHDD to provide  
10 services?

11 A. They are part of DBHDD. They're the mental  
12 health services in this area.

13 Q. Oh, are you familiar with the term Community  
14 Service Board?

15 A. Yes. They're part of the CSB.

16 Q. Okay. And so what do they do?

17 A. Those are more -- they provide counseling  
18 services for students at their office.

19 Q. At Pineland?

20 A. At Pineland, yes. That's initiated by parents  
21 and the parents keep up with those appointments.

22 Q. Okay. And then the last one there's a  
23 reference to LIPT. Can you see what that is?

24 A. The Local Interagency something team. So it's  
25 where the agencies in the area for a county get



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1 together and talk about kids who are high fliers or  
2 involved with more than one agency.

3 So it could be Department of Public Health,  
4 Department of Family and Children Services, the DBHDD.  
5 Students that are having issues, Department of Juvenile  
6 Justice, that if a student is involved with more than  
7 one entity, then they are brought to that board if  
8 they're having significant problems in any of those and  
9 they look at them.

10 And my understanding is that -- and it's not  
11 something that I'm always involved with. So let's say  
12 a student is having severe behavior issues at home and  
13 has been short-term hospital placed a couple of times  
14 in just a month or so.

15 Then they may look at that for a long-term  
16 hospitalization placement. Those types of things come  
17 out of that board, out of that LIPT.

18 Q. Okay. How many students would you say at  
19 Cedarwood are involved in LIPT?

20 A. I don't know. Off the top of my head I just  
21 don't know.

22 Q. Okay. I'm going to introduce another  
23 document. This will be 256 and it is GA00320375.

24 (Plaintiff Exhibit 256 marked.)

25 BY MS. TAYLOE:

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1 Q. All right. And I'm going to -- the attachment  
2 to that ends with 0376 so I'm going to introduce them  
3 both together as Exhibit 256. Okay. I'm going to  
4 share the screen. All right. I'm giving you control.

5 The first is the email and then I'll show you  
6 the attachment after you've had a chance to review the  
7 email.

8 (Witness reviewing document.)

9 BY MS. TAYLOE:

10 Q. So can you tell me, for the record, do you  
11 recognize this email?

12 A. Is there any more than "Attached is the  
13 document that you asked for. Let me know if you need  
14 any more changes"?

15 Q. No, no. That's the entirety of the email.

16 A. Okay. All right. In looking at it, I was  
17 trying to figure out if that was all.

18 I don't remember this email, but I do  
19 recognize it as something that my name is on it that I  
20 would have sent.

21 Q. Okay. And the subject line is open records  
22 request Cedarwood. Can you tell us what open records  
23 request is?

24 A. It's a request for records. It's something  
25 that I have to legally comply to. I can't say no.

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1 But this was -- my guess is because, like I  
2 said, I don't really remember even being asked for it.  
3 It was sent to me that the DOE had an open records  
4 request for interventions and providers in FYET.

5 Q. Okay. I'm just going to close this one now.  
6 This is the attachment that I'm going to give you  
7 control back. So this document is numbered GA00320376,  
8 and it was the attachment to the email you just read.  
9 And you have control.

10 (Witness reviewing document.)

11 THE WITNESS: Okay.

12 BY MS. TAYLOE:

13 Q. Okay. So do you have reason to believe this  
14 is a list that was done current of the interventions  
15 and providers offered at Cedarwood?

16 A. Yes.

17 Q. Are there -- so to the best of your  
18 recollection, would this have been accurate at the time  
19 you sent it?

20 A. Yes.

21 Q. Are there any interventions or additional  
22 services offered at Cedarwood now that are not on this  
23 list?

24 A. I don't think so.

25 Q. Okay. So I just kind of want to discuss

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1 some -- i-Ready and reading and math we talked about a  
2 little bit. That's an educational support, correct?

3 A. Yes.

4 Q. And SRA, reading master and decoding, is that  
5 also educational?

6 A. Yes, it is.

7 Q. So then individual counseling, we've talked  
8 about that. That's through Mr. Mullis and/or through  
9 providing space for other counselors to come in?

10 A. Yes.

11 Q. And then Why Try. I don't think we have  
12 talked about that yet. What's Why Try?

13 A. Why Try is an SEL program to -- it's a  
14 curriculum to help students with social emotional  
15 learning work through problems, problem solve, and deal  
16 with their emotions, anger management.

17 Q. Is this offered to everyone or is this for  
18 certain students at Cedarwood?

19 A. It was offered to middle school and high  
20 school students. I don't think that it was really  
21 appropriate for lower elementary students.

22 Q. Is it required for elementary school and high  
23 school students or just an option?

24 A. It's a tier one intervention that we were  
25 using, just an option. The teachers would use it as

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1 part of SEL in their daily schedule.

2 Q. So am I correct in assuming tier one means  
3 it's offered for everybody? Tier one is for all  
4 students?

5 A. Yes.

6 Q. And Skill Streaming is next. What's Skill  
7 Streaming?

8 A. It's another SEL-type program. It teaches  
9 specific skills and so, like, we have used Skill  
10 Streaming. So this is from FYE team. Do you want me  
11 to talk about the way we're using it now or the way we  
12 used it then?

13 Q. Both. I'm interested in what prompted changes  
14 too.

15 A. Okay. So we would use the Skill Streaming.  
16 It has different levels, so there's an elementary,  
17 there's a middle, and there's a high school level. So  
18 they're more appropriate.

19 So the Skill Streaming was what we were using  
20 in our elementary class in place of the Why Try. Now,  
21 it also works well as a Tier 2 or Tier 3 intervention  
22 because you can work -- you don't have to use the teach  
23 the skills in order. They can be used out of order.

24 So if a student was having a difficult time  
25 with following directions, you can pull that skill and

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1 teach it to the student and then follow up with it with  
2 that.

3 Q. Okay. Was that the --

4 A. Skill Streaming.

5 Q. Was that 2018 version or was that the what  
6 you're doing with now?

7 A. That was the 2018 version and a lot of what we  
8 were doing with it now, yes.

9 Q. So what was the difference? I missed what you  
10 said was the difference.

11 A. Well, the difference is that we don't use that  
12 in the classroom as much. We use it more as a Tier  
13 2/Tier 3 intervention.

14 Q. And both of these say they're taught -- both  
15 meaning Why Try and Skill Streaming are taught by a  
16 teacher or a paraprofessional. Are they certified in a  
17 particular technique or --

18 A. If they have been through training, yes.

19 Q. If they've been through what kind of  
20 training?

21 A. Well, Why Try offers training to use its  
22 program. And then Skill Streaming we've just done  
23 in-house training with that.

24 Q. Okay. When you say "if they have," so some  
25 teachers teach it even without having been through the

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1 training?

2 A. If they didn't go through the specific Why Try  
3 training, then someone at our site who had been through  
4 it would be their mentor and train them how to use it  
5 and then answer their questions.

6 Because, again, the issue is when things are  
7 offered and when you hire people and when you can get  
8 them trained.

9 Q. Got it. Okay. And then we have yoga and  
10 meditation. And it says it's taught by a contracted  
11 yoga instructor. Is this a yoga instructor with any,  
12 you know, special education or trauma-informed  
13 training?

14 A. She actually had -- she didn't have  
15 trauma-informed training but she had training for yoga  
16 with children and also some type of training for  
17 maybe -- I'm going to have to say I don't know because  
18 I can't recall exactly what it is.

19 But it was some specialized training, and she  
20 just really came in and did yoga and meditation with  
21 our students one time a week.

22 Now, she's not -- she did not do that last  
23 year, and we are actually having one of our staff is in  
24 yoga training currently that's called Breathe for  
25 Change that is -- I believe that it is trauma-informed,

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1 and she's going to do it at both sites this coming  
2 year.

3 Q. Thank you. Okay. And then ABA?

4 A. We were contracting with a coach to come in  
5 and work with our classrooms with our teacher. We've  
6 not done that in several years because we have had a  
7 difficult time actually finding someone that would come  
8 and do it.

9 Q. And is ABA for Applied Behavioral Analysis?

10 A. Yes, it is.

11 Q. And we haven't discussed check in and check  
12 out.

13 A. Check In and Check Out is a tiered  
14 intervention that we use with Tier 2 and Tier 3  
15 students identify students and basically is just a  
16 students whose behavior -- the function of their  
17 behavior is for attention.

18 So Check In and Check Out is a good way to  
19 work with that. They just have time with adult one or  
20 two times a day where the adult that they like, that  
21 they care about, that cares about them, that they have  
22 a relationship with, comes in and works with them.

23 And then the teacher kind of checks them in  
24 and out specifically on their goals, too, to give them  
25 that attention that they need in a positive way.



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1 Q. And so it's taught by varied support staff,  
2 the classroom staff. Is that because the child gets to  
3 pick the adult?

4 A. Yes.

5 Q. And is there any special training that goes  
6 with that or is it just to have the time?

7 A. There is some in-house training that we do  
8 with it on how to do it and kind of the right things to  
9 say, but there's no -- while there's training, it does  
10 not have to be done in a big, long format.

11 Q. How about Check and Connect?

12 A. Check and Connect was an intervention that was  
13 introduced by the Georgia Department of Education for  
14 all special ed programs or I guess all schools. I  
15 don't even know if it was just special ed programs in  
16 Georgia.

17 And we kind of got hooked up with that through  
18 our Southeast GLRS, and we don't use it anymore because  
19 what we found is that it really didn't meet the needs.  
20 It was more -- it worked better for students in schools  
21 that needed more specific interventions or support from  
22 people.

23 We just found out that our Check In and Check  
24 Out works as well, if not better, than that for us in  
25 our setting.

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1 Q. Can I just -- I want to better understand.  
2 Does it work better for schools that needed more  
3 support? I didn't understand that one.

4 A. Okay. Check and Connect is set up for  
5 students and middle school and high school really that  
6 may have attendance problems or students who are poorly  
7 motivated in big settings where there's not always  
8 someone that they can connect with.

9 And in our smaller setting with our students,  
10 we just found that identifying students who knew Check  
11 In Check Out is just as effective as the Check and  
12 Connect and what goes with that.

13 Q. Thank you. That was helpful.

14 Okay. And so the last question I have about  
15 this is almost all of this seems like it's funded  
16 through the GNETS state grant with a few things on hand  
17 and the one you mentioned coming from the GLRS.

18 The one Why Try is a federal grant. How does  
19 that come to be under the federal grant for that  
20 program?

21 A. I think I probably just pay for it with our  
22 federal. In our grant, we get state grant and then we  
23 get some money that is a federal grant. And so that  
24 specific year I paid for Why Try through that federal  
25 grant.

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1 Q. Okay. We'll come back when we talk about  
2 funding then. Okay. Thank you.

3 Is there anything else about that that  
4 reminded you of other services that were provided or  
5 the changes since that request was made?

6 A. No, I don't think so.

7 Q. Okay. And you've talked before -- you've  
8 mentioned before that you guys use PBIS. Can you tell  
9 me what PBIS is?

10 A. Positive Behavior Interventions and  
11 Supports.

12 Q. And what does that program -- how does it  
13 operate in Cedarwood?

14 A. It is a Tier 1 so everyone is part of it.  
15 PBIS goes with the assumption that just like the  
16 deficits in reading and math need to be taught, that  
17 deficits in behavior need to be taught.

18 Expectations need to be clear and they need to  
19 be consistent across all areas within the school. So  
20 everyone speaks the same behavioral language. We post  
21 posters with expectations, school-wide expectations,  
22 classroom expectations to keep everything on the same  
23 level.

24 Q. So you say PBIS is a Tier 1 support. Can we  
25 talk a little bit about what are Tier 2 and Tier 3

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1 supports at Cedarwood.

2 A. So we use the Skill Streaming as a Tier 2  
3 support. Also, the Check In Check Out is a Tier 2,  
4 Tier 3 support. We use counseling as the Tier 2 and  
5 Tier 3 supports.

6 Q. And how do students get identified for Tier 2  
7 level supports?

8 A. We do what we call tri-data, look at students  
9 every -- at the end of every nine weeks and look at  
10 their BASC 3 scores, BASC dash 3 scores, and their  
11 behavior data and then their attendance and their  
12 grades and their office referrals.

13 And then we kind of meet on each kid and  
14 decide what level of support that they need, Tier 1,  
15 Tier 2, or Tier 3. I can't give you all of the  
16 percentages right off the top of my head.

17 Q. That's okay. And when they are identified as  
18 Tier 2 or Tier 3, are they offered extra support? Are  
19 they required to do certain things?

20 A. They're required to do certain things. They  
21 would meet with the staff that's called the  
22 interventionist on a schedule.

23 If we have permission for them to see the  
24 counselor, that would be one of the things they may,  
25 like a Tier 3 student, may see the counselor a little

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1 more than others or be offered that.

2 The Check In and Check Out for them may be at  
3 a different rate and level, amount of time. Some  
4 students may do Check In Check Out every single day or  
5 twice a day, and others may do it just a couple of  
6 times a week.

7 Q. And then how -- I presume at some point  
8 students can go back down from a Tier 3 to a Tier 2 or  
9 from a Tier 2 to a Tier 1?

10 A. Yes.

11 Q. Does that happen by the same mechanism when  
12 you do the tri-data?

13 A. Yes.

14 Q. And that's checked every nine weeks?

15 A. Yes.

16 Q. Is there any relationship between the tiered  
17 supports and the tri-data evaluation and a student's  
18 FBA or BIP?

19 A. If a student is Tier 2 -- I'm trying to think.  
20 I know Tier 3 students, if they're on Tier 3 and  
21 continue to be Tier 3, then an FBA is conducted and  
22 then adjustments are made for their behavior and  
23 intervention plan. And, I'm sorry, I can't remember if  
24 it is also true of Tier 2 right off the top of my head.

25 Q. Okay. But you said if they were on Tier 3 for

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1 a certain time. Do you remember how long that time  
2 is?

3 A. I don't remember. And I don't remember if it  
4 is specifically okay a student is on Tier 3 so we  
5 automatically do it. I've got it all written down  
6 but...

7 Q. Okay. That's fine. But at some point we're  
8 not sure about Tier 3 status would trigger a review of  
9 FBA and possible adjustment to the BIP?

10 A. Yes.

11 Q. And when you said with the tri-data review, it  
12 includes like office referrals and behavior data. How  
13 do those things weigh? Like, is a certain number of  
14 office referrals going to trigger a raise to the next  
15 level or is it a factor along with other things?

16 A. It's a factor along with other things and it's  
17 written down. We have it as a guideline, but I don't  
18 know right off the top of my head. It's not something  
19 that I used every -- enough to have memorized it.

20 Q. Who actually does this? Do the psych  
21 coordinators do this?

22 A. The psych coordinators and the teachers. The  
23 teachers and the paraprofessionals will get the sheets ready and  
24 pull the information together. And then students who  
25 are flagged, then they have a meeting as to assign

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1 different levels or tiers.

2 Q. I just want to confirm your school does not  
3 participate or Apex -- Cedarwood does not participate  
4 with Apex program; is that correct?

5 A. That's correct.

6 Q. Do you know what the Apex program is?

7 A. I have a very base understanding. I know that  
8 it is some type of a counseling, but I don't really  
9 know exactly what it is.

10 Q. Have you ever inquired about participating  
11 with Apex?

12 A. No.

13 Q. Why not?

14 A. I just thought it had to be offered to you.

15 Q. Do you remember what gave you that  
16 impression?

17 A. I don't.

18 Q. We talked about some of these other ones. You  
19 mentioned restorative practices. What is a restorative  
20 practice, training, or learning that you mentioned?

21 A. June of '21 my staff did restorative practices  
22 training, the base training for that including  
23 restorative circles. And then this past June we did  
24 the next step in that with restorative conferences.

25 Q. Do you use those with your students?

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1 A. We use the restorative circles and do the  
2 different circles to help with just comfort and  
3 building relationships and then also to deal with basic  
4 problems. Yes, the teachers in the classroom use it.

5 Q. And so that's not a tiered thing. That's just  
6 an as-needed program or has a dispute or issue that  
7 they need help resolving?

8 A. Yes.

9 Q. Do you know if the general education settings  
10 in which you guys offer consultation services or when  
11 you get referrals, do you know if they have PBIS?

12 A. Some of the schools, the systems that serve  
13 Cedarwood are PBIS schools. I don't know which ones  
14 are.

15 Q. Do you know if any of them participate with  
16 Apex programs?

17 A. I don't know.

18 Q. And do you know if any of them have staff that  
19 are trained in trauma-informed care and social  
20 emotional learning?

21 A. I don't know specifically.

22 Q. And this is just total out-of-state person  
23 questions. Do most general location schools in Georgia  
24 have counselors on-site?

25 A. They have counselors, yes, that I know of.



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1 But they're not really mental health counselors, all of  
2 them.

3 Q. That's what I was going to ask. Are they like  
4 helping scheduling and applying to college kind of  
5 counselors but not really health counselors?

6 A. That's for upper levels. And my personal  
7 experience with this with my own students here in  
8 Bulloch County, the counselors pull them out and do  
9 good touch, bad touch and do career exploration and  
10 that kind of thing.

11 And they do pull kids who have issues, but I  
12 don't believe that they do counseling, mental health  
13 counseling.

14 Q. And do general education schools generally  
15 have social workers on staff?

16 A. I don't know. I know that Bulloch County has  
17 social workers, but I don't know how many social  
18 workers and what the other school systems have for  
19 social workers.

20 Q. Okay. And to wrap up this section, do you  
21 have any wish list in mind about any other therapeutic  
22 services or support you wish you could offer for your  
23 students at Cedarwood?

24 A. I don't know. That one caught me off guard  
25 for sure. I'm sure I can come up with a wish list.

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1 Q. Yeah, don't we all wish we had the luxury of  
2 submitting it.

3 A. Yeah.

4 Q. All right. Well, if you think of anything and  
5 you want to come back to it, that door is open.

6 A. Okay.

7 Q. Are you going to grant it like my fairy  
8 godmother?

9 A. I wish I could. Believe me.

10 Q. Okay. I'm going start education, but I want  
11 to check, does anybody want a break?

12 THE WITNESS: I need a quick break just to run  
13 to the restroom.

14 THE VIDEOGRAPHER: Off the record at 3:29.

15 MS. TAYLOE: Okay.

16 (Recess.)

17 THE VIDEOGRAPHER: This is the beginning of  
18 Media 3 in the deposition of Director Whitney Braddock.  
19 We are back on the record at 3:38 -- or excuse me --  
20 we're just back on the record at 3:38. This is still  
21 Media 3, not the beginning of Media 3.

22 BY MS. TAYLOE:

23 Q. All right. I couldn't hear him, but are we  
24 ready?

25 A. We are ready.

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1 Q. Thank you. You have to be the go-between.  
2 Okay. I want to talk about the centers themselves for  
3 a bit, and then we'll move on to the educational  
4 services within there.

5 So the buildings -- so we'll have to do it for  
6 each site. So starting with Statesboro, you told us  
7 that Cedarwood has been in there since July of 2012.

8 Do you know when the building was built?

9 A. I do not.

10 Q. Do you know who -- what it was used for before  
11 Cedarwood occupied it?

12 A. Prior to Cedarwood occupying it, it was  
13 Julia P. Bryant Elementary. They built another school,  
14 elementary school right around the corner from it for  
15 Julia P.

16 And then another school Mattie Lively used it  
17 while they were building their new school. And then  
18 that is when we moved into it after those two  
19 elementary schools had left.

20 Q. So two different sets of students used the  
21 buildings while their new schools were being built, and  
22 then the Cedarwood students moved into it after that?

23 A. Yes. Well, it had been Julia P. school for as  
24 long as I know and then they moved into their new  
25 school. And then they were rebuilding the Mattie

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1 Lively School on the same site the old Mattie Lively  
2 school was on. So they moved them into that school for  
3 a year while they tore down their school and rebuilt.

4 Q. You mentioned the J.P. Bryant School is now  
5 right around the corner. Is there any interaction  
6 between students at your program, your site, and  
7 theirs?

8 A. No.

9 Q. And then same question for Lyons. You said  
10 it's been occupied since 2016, and we heard earlier  
11 about some moves of the program.

12 Do you know how old the Lyons building is?

13 A. I do not. The building that we're in, though,  
14 on that site is the newest building there. But I don't  
15 know when it was built.

16 Q. So the newest building on that site. So there  
17 are other buildings -- I wasn't, as you know, present  
18 at the site visit.

19 A. Right.

20 Q. So there's more than one building on the  
21 site?

22 A. Yes. It was formerly Lyons Primary School.

23 Q. Okay. The whole site was formerly Lyons  
24 Primary School?

25 A. The property itself. And then we are in what

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1 was the pre-K building of Lyons Primary School.

2 Q. Was it renovated in between?

3 A. There were some renovations made but not many.  
4 That building probably was -- it was not that old when  
5 we moved into it.

6 Q. I'm just picturing the preschool water  
7 fountains at the height of knee-high of high school  
8 students there. Did they adjust all that?

9 A. They had one low and one high water fountain  
10 so...

11 Q. Okay. So do you know where the Lyons Primary  
12 School students went?

13 A. They went to the old Lyons High School  
14 building, and they built a new Lyons -- Toombs County  
15 High School.

16 Q. Okay. Are there -- especially given these are  
17 old schools, are there science labs in these  
18 buildings?

19 A. No.

20 Q. Is there a library?

21 A. No.

22 Q. Is there a cafeteria?

23 A. No. Our meals are brought in from Statesboro  
24 from Julia P. Elementary. Our meals are brought to us.  
25 And then in Lyons they're brought from one of the

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1 Toombs County. I think Toombs County middle school.

2 Q. Okay. Do they bring in hot lunches or box  
3 lunches?

4 A. Hot lunches.

5 Q. Are they still hot when they get there?

6 A. They pack them in insulated containers.

7 Q. And then do the students eat in the cafeteria  
8 or in their classrooms?

9 A. In Lyons they eat in their classrooms, and in  
10 Statesboro they eat in two different rooms that are set  
11 aside to be cafeterias.

12 Q. I'm curious why is that for both of them. Why  
13 in Lyons do they eat in their classroom? Is there not  
14 another room that can be used?

15 A. There is not, no.

16 Q. Okay. And why two different rooms in  
17 Statesboro?

18 A. Just to give enough room for -- we set aside  
19 two classrooms to be lunch rooms, and so the lunch room  
20 tables were in there. And we let -- it kind of just  
21 breaks it up. The elementary kids are in one class and  
22 then the high school and middle school students use  
23 another.

24 Q. Okay. Because lunch comes out at the same  
25 time, so they all eat at the same time and you divide

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1     them up by rooms?

2             A.     Yes.

3             Q.     Is there a music room?

4             A.     No.

5             Q.     Is there any -- is there any -- are there any  
6     specials offered?

7             A.     Any type of specials would just be offered by  
8     the classroom teacher.

9             Q.     And do they have supplies for that? Do they  
10    have musical instruments and art supplies and things  
11    like that?

12            A.     We purchase those, yes.

13            Q.     What kinds of -- what kinds of supplies do you  
14    purchase?

15            A.     Well, just art supplies. If a teacher asks  
16    for certain supplies to do art projects and that kind  
17    of thing with.

18            Q.     But not musical instruments?

19            A.     We have some musical instruments, yeah, like  
20    maracas and tambourines and drums and xylophone, that  
21    kind of thing.

22            Q.     Okay. And is there a gymnasium?

23            A.     We have access to the gymnasium in Lyons, but  
24    in Statesboro we do not.

25            Q.     And what do the children -- I'm sorry, what do

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1 the students do for Phys Ed then?

2 A. There is a football field in Statesboro that's  
3 behind our building that's used. One of the middle  
4 schools uses it for their football, so it's kept up.

5 And so the students will go out there and  
6 play, do activities, or we also have a playground with  
7 a basketball goal.

8 Q. Is that for both?

9 A. That's at Statesboro, yes.

10 Q. Okay. What about Lyons?

11 A. In Lyons, we have use of the gym and there is  
12 a playground.

13 Q. Can you describe the playground at Statesboro  
14 for me?

15 A. There are swings and monkey-bar-type things, a  
16 slide, a volleyball net, and a basketball court,  
17 basketball goal and benches.

18 Q. Are the slide and the monkey bars, are they  
19 metal?

20 A. Those are -- the slide is a plastic slide, and  
21 the monkey bars are a coated metal. I couldn't tell  
22 you exactly what they're made out of.

23 Q. Okay. And what about at the Lyons  
24 playground?

25 A. The Lyons playground has swings and a metal



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1 slide that is not used.

2 Q. Why is it not used?

3 A. Because it's a metal slide. I don't know if  
4 you've been to Georgia in August, but nobody wants to  
5 slide down that.

6 Q. I was thinking about the metal slide when you  
7 talked about the heat there. I was like I would not  
8 want to go down a metal slide in Southern Georgia?

9 A. I wouldn't want to do it in December.

10 Q. I saw pictures, but I didn't know which  
11 facility that picture was of because in the background  
12 of that one I could see another playground in the  
13 background.

14 Is that the elementary school you said was  
15 around the corner or --

16 A. Yes, yeah.

17 Q. -- is that the other one? Well, in any case,  
18 there's a newer playground that is within sight of the  
19 Lyons playground but the students can't use it?

20 A. No. That's -- what you're thinking about is  
21 the Statesboro site that the new playground is.

22 Q. Okay.

23 A. The Lyons site, that's just -- the neighbors  
24 of the Lyons site, it's a residential area.

25 Q. Okay. So the school around the corner is from

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1 the Statesboro site?

2 A. Yes.

3 Q. And that's the newly constructed Julia P.  
4 Bryant school?

5 A. Yes.

6 Q. And was there any discussion about whether the  
7 GNETS students could use that playground?

8 A. No, not that I know of.

9 Q. Do students at either site have opportunity to  
10 participate in extracurricular activities?

11 A. Yes.

12 Q. What are they?

13 A. They are allowed to play sports and  
14 participate in -- we've had students that played sports  
15 back at their local school system, but we don't  
16 currently have anyone that's doing that.

17 Q. And how does that work? So when they get on  
18 the bus, the bus takes them back to the school so they  
19 can participate there?

20 A. Yes.

21 Q. And they get it there in time for the  
22 extracurriculars?

23 A. We've had students that were in Statesboro  
24 specifically that were going back to Statesboro High  
25 School and participating in ROTC there.

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1 Q. Is Statesboro High School close to the  
2 Cedarwood facility?

3 A. It is about four miles across town. It takes  
4 maybe ten minutes.

5 Q. And then on the map you showed us, there's a  
6 room identified as an isolation room at Statesboro.  
7 What is that used for?

8 A. That actually is used for -- like, we have our  
9 Friday PBIS meetings in there. Also, students that  
10 need to be removed to have -- like to do work by  
11 themselves with a staff in there, something like that,  
12 that's what that's used for.

13 Q. So is that the same as the auxiliary room?

14 A. The auxiliary room? I'm not certain which one  
15 that is on the map.

16 Q. Okay. It's not on the map but on the  
17 schedule. When we get to the schedule, I'll ask about  
18 that because I didn't know.

19 Then I'm going to -- speaking of the  
20 schedules, I'm going to put up the schedules you sent,  
21 which was very helpful. Thank you. And I'm going to  
22 mark as Exhibit 257 a document identified as 002182.

23 (Plaintiff Exhibit 257 marked.)

24 BY MS. TAYLOE:

25 Q. Do you recognize this document?

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1 A. Yes.

2 Q. Can you tell me what it is, please.

3 A. It is the Lyons site basic daily schedule.

4 Q. And what grades is this for?

5 A. Well, there's -- it's columns so there's a  
6 column for elementary. There's a column for middle and  
7 high school students class. And I'm trying to move it  
8 over to see what the other one is. There we go. And  
9 then a column for what they call their ID-1 class and  
10 ID-2 class.

11 Q. And what does ID-1 and ID-2 stand for?

12 A. I don't know exactly what they have that  
13 called for, but they have students -- there are  
14 students with autism that are in those two classes.

15 Q. Okay. So when -- for instance, in the middle  
16 high school block there are five things listed in  
17 there. Do you know, is that something they do on a  
18 rotating basis or all those things happen there or it  
19 varies by day?

20 A. Those things happen -- so like everyone would  
21 come in and do a check-in. And then morning work may  
22 be done while some students are working on SRA and  
23 Edgenuity.

24 And I'm not completely certain what Apex is.  
25 I believe that it is an academic program similar to

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1 Edgenuity that is provided by one of the school systems  
2 for their high school students.

3 Q. Okay. And so for the record, that's not the  
4 same as the Apex program we were talking about  
5 before?

6 A. That is not. No, no.

7 Q. And are SRA and Edgenuity, and to the best of  
8 your understanding, Apex, are those all online  
9 curriculum tools?

10 A. SRA is a remediation program for reading.

11 Q. Is it online?

12 A. No, it's not. It's face-to-face. It's done  
13 individually with students.

14 Q. Okay. So morning work SRA would be students  
15 doing work with the teachers and the paraprofessionals  
16 are walking around and supporting them.

17 A. Yes.

18 Q. And those on Edgenuity and possibly Apex --

19 THE REPORTER: Can you repeat the question?

20 THE WITNESS: So finish what you were saying  
21 with Edgenuity and Apex, Laura.

22 BY MS. TAYLOE:

23 Q. So Edgenuity and Apex -- well, you're not sure  
24 about Apex. We'll just say Edgenuity is an online  
25 resource so students can be working on that while the

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1 parapro and teacher are walking around helping with SRA  
2 and morning work?

3 A. Yes. Edgenuity and Apex are an online  
4 curriculum.

5 Q. So do you have a sense then looking at -- I  
6 have to give you control, I'm sorry. Oh, you do have  
7 control but I do too.

8 Do you have a sense looking at the schedule  
9 how much of a student's day is spent on social skills,  
10 SEL, and behavioral lessons and things and how much is  
11 spent on curricular state-mandated instruction.

12 A. Well, you can see. You know, there's times  
13 there so -- and what I can say, too, is a lot of SEL  
14 things happen.

15 If there is an issue if a student is having a  
16 behavioral issue, if it includes just that one student,  
17 they may be pulled to deal with it and to go through  
18 the problem. Or if it's more than one student, it may  
19 be that we all, you know, they would all work together  
20 with it.

21 Q. Okay. Well, looking -- let's say we're  
22 looking through the elementary student then?

23 A. Okay.

24 Q. Structural time IC would be 9:30 to 10:30.  
25 Would there be live instruction during that period for

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1 ELA and i-Ready?

2 A. Yes.

3 Q. Even though i-Ready is also an online  
4 curriculum; is that correct?

5 A. Correct, yes.

6 Q. And then 11:00 to 12:00 math and i-Ready would  
7 be instructional?

8 A. Uh-huh.

9 Q. And then 1:30 to 2:00 science and social  
10 studies?

11 A. Yes.

12 Q. So two and a half hours?

13 A. Well, I'm not certain what PMC is. But, yes,  
14 that's what it looks like.

15 Q. Okay. And we already talked a little bit  
16 about this. So you have all the elementary students  
17 are together in this elementary column; is that  
18 correct?

19 A. Yes.

20 Q. And do they have the same teacher for the  
21 day?

22 A. Yes, they do.

23 Q. And what about middle and high school  
24 students. It's not atypical for elementary students to  
25 be with a teacher for the same day. But do the high

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1 school have one teacher for the whole day as well?

2 A. They do have one teacher, yes.

3 Q. And is that teacher certified in -- what  
4 contents is that teacher certified in?

5 A. I know she's content certified in special ed  
6 through eighth-grade content. She's not content  
7 certified in high school. That's why we use the  
8 Edgenuity and the Apex platforms.

9 Q. Okay. So when students are working on online  
10 platforms, they don't have an instructor who is  
11 certified in a content area in order to deal with and  
12 be able to ask questions to?

13 A. They are able to ask questions to the teacher  
14 that's in the classroom. The teacher can help them.  
15 If they need help, they can ask for help.

16 Q. Okay. But the teacher is not content  
17 certified in those areas?

18 A. She's not teaching them. She's not content  
19 certified, no.

20 Q. So she's facilitating their self-instruction  
21 of the online resources?

22 A. Yes.

23 Q. Okay. I think I'm going to move on to the  
24 other schedule. And ask that it be marked as  
25 Exhibit 258. It is 002183.



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1 (Plaintiff Exhibit 258 marked.)

2 BY MS. TAYLOE:

3 Q. Do you recognize this document?

4 A. Yes, I do.

5 Q. Okay. And what is this?

6 A. It's the Statesboro site's middle school and  
7 high school schedule.

8 Q. Can you scroll up and down. I want to make  
9 sure you have control because I'm getting a message.  
10 Okay.

11 A. As good as I am at it, I can maybe. It says  
12 my internet connection is unstable. I think you're  
13 moving it now.

14 Q. I can't hear you guys anymore.

15 A. Can you hear me now?

16 Q. Yes.

17 A. I think that there was an internet getting, as  
18 my kids would say, lagging.

19 Q. I'm glad you're back.

20 A. I left. I've had enough.

21 Q. So do you have control of the document? Can  
22 you make it scroll?

23 A. Yes.

24 Q. Okay. Good. So this class looks like or this  
25 site looks like it's set up differently. Instead of

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1 having the grades in one column, we have the teachers  
2 at the top. So I'm not sure if this is one teacher  
3 having all the same students in the day or if the  
4 students move around in this example.

5 A. Pre-COVID the students actually moved class to  
6 class. But post-COVID we had the teachers actually  
7 moving classes.

8 Q. Okay.

9 A. Hopefully this year we can get back to  
10 students moving. We'll see what our friend COVID  
11 brings when school starts.

12 Q. Yeah. I'm sure that's just one more challenge  
13 in an already challenging set of circumstances.

14 So in this case, then, the teachers tend to  
15 teach -- they stick to more of a content area and teach  
16 different groups of students instead of having the same  
17 group of students for all the content areas.

18 Is that correct --

19 A. That's correct, yes.

20 Q. Okay. So what does -- I don't know the first  
21 names -- Mr. or Ms. Thompson teach?

22 A. So Mr. Thompson teaches -- he has some high  
23 school certifications, and so he teaches some of the  
24 high school courses. When you see on here where it  
25 says high school E2020, that's the same thing as

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1 Edgenuity.

2 Q. Okay.

3 A. It used to be E2020 and then the name, the  
4 company changed the name to Edgenuity. But old habits  
5 die hard and E2020 is easier to write.

6 So it looks like Mr. Thompson teaches world  
7 history, middle school science, social skills, that's  
8 the SEL class with the high school. He teaches middle  
9 school math class.

10 Well, I was doing good with scrolling it.  
11 He's with the eighth grade students and the high school  
12 students at lunch and at break. And then his sixth  
13 period is high school students doing different  
14 remediations, catch up on some of their E2020 classes  
15 if they need help.

16 Most of our high school students don't use  
17 i-Ready. But we have some high school students who are  
18 really academically behind, so some of them may use  
19 i-Ready during that time.

20 Q. Okay. And then how about the next column,  
21 that teacher?

22 A. That is Ms. Michael and she is certified to  
23 teach ELA in special ed through eighth grade. So she  
24 teaches the ELA sixth and seventh grade students.

25 She then teaches eighth grade ELA to the

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1 eighth grade students and then her high school students  
2 are doing the E2020 platform. She does the social  
3 skills, which is the SEL stuff, that would be Why Try.  
4 And we do like group meetings and that kind of thing.

5 Then she has the upper high school students  
6 for E2020 Because she is more of an ELA person, she  
7 would supervise some of that ELA stuff that they may do  
8 for that. It just kind of depends on what is on their  
9 schedule.

10 Q. Okay.

11 A. She has the upper high school students for  
12 lunch and then the break -- then that remediation  
13 period, she then has the eighth grade and the high  
14 school students.

15 Q. So why does it say upper high school in some  
16 place and high school in the other? Is there a lower  
17 high school?

18 A. There is. So it would -- I think in the upper  
19 high school or the tenth, eleventh, and twelfth  
20 graders, and I believe that they combined.

21 I think that there were two eighth grade  
22 students, one of which should have been in ninth grade,  
23 and so she taught them with the ninth graders there  
24 together, grouped together.

25 Q. So when it says eighth and high school, does

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1 that mean eighth and ninth graders?

2 A. I believe, yes.

3 Q. And upper high school is ten through  
4 twelfth?

5 A. Yes.

6 Q. Okay. That's helpful.

7 A. So then you have Ms. Luzzi who does eighth  
8 grade social studies and then the high school E2020 in  
9 with that. That would be the ninth graders working on  
10 their Edgenuity.

11 And then that second period she does high  
12 school E2020 and then she does the social skills with a  
13 middle school group, which are sixth and seventh  
14 graders generally. There may be others. I don't  
15 believe that there's anything but sixth and seventh  
16 graders in that group. They're mostly sixth graders.

17 And then Mr. Thompson -- no, she goes over and  
18 teaches with -- well, he must move over to her room.  
19 She co-teaches with him for middle school math. He's  
20 the one that has the certification for it, and she's in  
21 the room with him when he teaches the lessons.

22 Q. What is her certification in?

23 A. She has special ed certification, and she has  
24 special ed through eighth grade through ELA and social  
25 studies.

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1 Q. Okay.

2 A. And then on down where she's teaching the  
3 middle school social studies, and then she has that  
4 middle school group for the rest of the day.

5 Q. And so all these saying middle school, is that  
6 also social studies?

7 A. No. She's doing -- so fifth period is social  
8 studies, but then she does lunch with that middle  
9 school group. She does break with that middle school  
10 group. And then she does that end of the day  
11 remediation with that middle school group.

12 Q. Okay. So can we do a quick tally again about  
13 how much is actual instructional time then?

14 A. All right. Let's see.

15 Q. The fifth period.

16 A. So fifth period, fourth period, third period,  
17 second period, and first period. Most of those -- all  
18 those morning periods are academic times.

19 Q. Okay. And then if you can go back up to the  
20 top, I think this is where I saw auxiliary, yeah.  
21 Auxiliary room, what is this room?

22 A. There's no room for that in specific. So our  
23 interventionists may pull students for breakfast  
24 buddies, and so she may bring them into her office.  
25 She has an office with a small conference table in

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1 there.

2 And then the tiered behavior group, she might  
3 use her office or she might use one of the lunch rooms.  
4 It just kind of depends on what's being used.

5 Q. Okay. So that leads me to another set of  
6 questions then. So students are pulled from the class  
7 to receive sort of individual services?

8 A. Right. So they're scheduled during that  
9 social skills, that SEL time, and then morning  
10 breakfast time.

11 Q. What is it? I'm sorry.

12 A. So when they are pulled for their tiered  
13 behavior group, it's during the social skills. That  
14 third period is actually a social skills SEL time.

15 Q. And what about counseling and other services.  
16 Are they pulled from class for those?

17 A. They are pulled from class for those, yes.

18 Q. Is there any tracking of instructional minutes  
19 that's done?

20 A. No.

21 Q. And what about we talked before about students  
22 who leave school to go to a general education setting  
23 for the day.

24 How does that line up with what they're  
25 missing here both in terms of the time of the day the

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1 classes they are attending and the transportation time?

2 A. So we work around what time they're scheduled  
3 to go to the LEA for classes.

4 And so that remediation time at the end of the  
5 day, if a student, say, missed high school world  
6 history and they're back with us -- they're gone in the  
7 beginning of the day and then they're back with us at  
8 the end of the day, that may be when they would be  
9 pulled into Mr. Thompson's class and he might do that  
10 then.

11 We work our schedule around what their needs  
12 are out in the local school system.

13 Q. Okay. So they don't necessarily just leave  
14 early from the day. They might leave in the middle of  
15 the day and go to whatever class they're attending in  
16 the local school system and then come back?

17 A. That's a possibility. Usually we try to  
18 either have them start with us or end with us and then  
19 just have one bus ride.

20 Q. Okay. I think I'm done with this. I'm going  
21 to stop sharing.

22 Do the elementary students and the middle and  
23 high school students ride on the same buses when they  
24 come to Cedarwood?

25 A. Yes, they do.



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1 Q. Has there ever been any issues with that?

2 A. There are bus issues but no specific issues  
3 because of the age. Most of the buses have a bus aide  
4 and a bus driver.

5 Q. What would you say are the bus issues?

6 A. Just bus behavioral issues. Not sitting down,  
7 throwing things, using inappropriate language, because  
8 they also ride these buses then with other special ed  
9 students from other schools at the Statesboro site.

10 Q. Where do those students go?

11 A. So the -- I'm going to explain this, to the  
12 best of my knowledge, because I'm not in charge of  
13 transportation and try not to be.

14 But so in Bulloch County the hub for special  
15 ed buses is in our parking lot. And so special ed  
16 buses around the county may pick up students. They  
17 come there and transfer students to different buses to  
18 go to different schools because the schools in Bulloch  
19 County don't all necessarily offer every single --  
20 like, one school may have EBD class and a different  
21 school would have their students with autism.

22 I don't know how they choose. I don't know  
23 how they move them around. So when the buses come to  
24 our parking lot, they drop our kids off. They may  
25 transfer some of the Bulloch County students right

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1 there, and then that bus would take them to their  
2 school, their service school.

3 Q. I see.

4 A. None of the other counties are that way.

5 Q. That's just the Bulloch County buses?

6 A. Yes.

7 Q. Have any students been screened for gifted  
8 services?

9 A. I don't know.

10 Q. And do you know if any are receiving gifted  
11 services?

12 A. None at the current time.

13 Q. Do these students get their pictures taken  
14 for -- school photos taken?

15 A. No.

16 Q. Do they -- as far as you know, do they appear  
17 in any yearbook?

18 A. As far as I know, they do not.

19 Q. Are there regular events for students and  
20 families to socialize or celebrate at Cedarwood?

21 A. We do family things. Like our Lyons site I  
22 know this year did -- they do like a Valentine thing,  
23 you know, cookies with parents and have done several  
24 different things.

25 And Bulloch County this year they did not

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1 allow people back into the building, so we had an open  
2 house and that was it. But prior to COVID, we did a  
3 lot of family things.

4 Q. The casualty of COVID. Okay. Now, I want to  
5 specifically ask about the middle schoolers and high  
6 schoolers. Do they have all the courses available they  
7 need for graduation?

8 A. They do. They are able to get -- the high  
9 school students are able to get everything that they  
10 need for graduation through the Edgenuity platform.

11 Q. So they can get high school credit for doing  
12 it through Edgenuity?

13 A. Yes.

14 Q. Okay. As we talked about, they don't  
15 necessarily have access to anyone on-site, and the  
16 subject, they may not have access to a certified  
17 teacher?

18 A. Right.

19 Q. Are there courses for an advanced diploma like  
20 foreign languages? Do they have access to that?

21 A. On Edgenuity, yes.

22 Q. Does that count for high school credit?

23 A. Yes, it does.

24 Q. What about with lab. Can they get all the  
25 credits they need for science courses?

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1 A. Yes. So the Edgenuity provides a virtual lab  
2 experience.

3 Q. Were any students at Cedarwood in the last  
4 couple of years enrolled in AP or honor courses?

5 A. Not that I know of.

6 Q. And you mentioned that some Cedarwood students  
7 have participated in extracurricular activities in the  
8 past. I know you said some things weren't happening  
9 now. Sports I think weren't happening. There were  
10 none currently participating; is that right?

11 A. I don't have any currently participating, and  
12 I don't know of any interest of any to participate.

13 Q. Okay. What about besides sports. Do they do  
14 any clubs or teams?

15 A. There's none participating in any, no.

16 Q. Just this year?

17 A. I don't know of them participating in any  
18 clubs. In the past, like I said, we had one student I  
19 know that did ROTC and was very active in ROTC.

20 Q. Okay. Do you know if any of your students  
21 attend sporting events or dances with their general  
22 education peers?

23 A. I don't know. They are able to. I think  
24 we're frozen.

25 (Zoom froze.)

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1 BY MS. TAYLOE:

2 Q. Then do high school students who graduate, do  
3 they have a graduation ceremony?

4 A. High school students that graduate are  
5 eligible to graduate with their graduating class back  
6 at their home school.

7 Q. Do you know if they participate in that  
8 ceremony?

9 A. We have had students that have participated in  
10 that ceremony, yes.

11 THE VIDEOGRAPHER: We've got about five  
12 minutes left on Media 3.

13 BY MS. TAYLOE:

14 Q. Okay. I just want to really quick ask about  
15 other like nontherapeutic special education services.

16 Do you have access to, for instance, a speech  
17 language therapist if a student needs that?

18 A. Yes.

19 Q. How is that arranged?

20 A. The school system arranges it. In Bulloch  
21 County, the speech pathologist comes over and sees the  
22 kids who have the speech eligibility.

23 And at our Lyons site there is a retired  
24 speech pathologist who contracts with all of the school  
25 systems to provide speech services to the Cedarwood

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1 students that need it.

2 Q. What about students with dyslexia or  
3 something, you know, else that's not behavior  
4 related?

5 A. I don't know of any services that they're  
6 getting for that.

7 Q. If a student has an IEP that calls for a  
8 service that the program staff are not able to provide,  
9 what's the process?

10 A. The school system would provide that. They  
11 would send a person over to provide that.

12 Q. And how would that happen? Would you send a  
13 request or how would that happen?

14 A. So usually it's set up when you're having an  
15 IEP meeting and that service is then in the IEP, and so  
16 the special ed director or the designee then would make  
17 arrangements for that.

18 Q. And then I just want to go back real quick.  
19 When you said that you don't know of any students  
20 participating in extracurriculars, have you conducted  
21 any kind of survey or asked students if they would want  
22 to do that?

23 A. Usually if students come and ask, they will  
24 say I want to play football or I want to play  
25 basketball.

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1 And so then we'll contact their school and the  
2 coach and see what needs to be done, contact their  
3 parent and see if that's okay with them. So we  
4 facilitate it.

5 Q. Okay. But if students didn't know, for  
6 instance, there's a debate club or Future Farmers of  
7 America club at their high school, they wouldn't have  
8 any way of finding that out?

9 A. They would not, no.

10 MS. TAYLOE: Okay. We can take a break for  
11 the recording media.

12 THE VIDEOGRAPHER: This is the end of Media 3  
13 in the deposition of Director Whitney Braddock. We are  
14 off the record at 4:27.

15 (Recess.)

16 THE VIDEOGRAPHER: This is the beginning of  
17 Media 4 in the deposition of director Whitney Braddock.  
18 We are back on the record at 4:33.

19 BY MS. TAYLOE:

20 Q. Okay. Now, we're going to talk a little bit  
21 about funding and the grant process. So do you know  
22 what was Cedarwood's operating budget for the 21/22  
23 school year?

24 A. Not off the top of my head, no.

25 Q. Do you have a ballpark?

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1 A. It was maybe at 1.2 million, but I'm not  
2 completely certain.

3 Q. Okay. But in that neighborhood. And like you  
4 said before, that goes to the RESA, and RESA pays most  
5 of the -- like the salaries and things of that from  
6 that?

7 THE REPORTER: I'm sorry, there was no answer.

8 THE WITNESS: Oh, I'm sorry. Yes.

9 BY MS. TAYLOE:

10 Q. We've done so well for so long.

11 Do you know what the operating budget for the  
12 next school year is projected to be?

13 A. I don't know. It's less than it was last  
14 year, but I just don't know the numbers.

15 Q. How do you know it's less?

16 A. I've gotten the budget numbers, but I don't  
17 know what the numbers are. But it's less money.

18 Q. Do you know about how much less?

19 A. I don't. I just -- my father wanted me to be  
20 an accountant, and I'm not good with numbers. I mean,  
21 I can add, subtract, multiply, and divide. But  
22 remembering them, I'm not -- I can't. I don't know.

23 Q. But when you get the budget, does it -- I'm  
24 curious what level of detail -- so you have this much  
25 for staffing and this much for this and this much for



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1 that or is it just a fixed amount and you do what you  
2 want with it?

3 A. It's a fixed amount, and I do with it what I  
4 want.

5 Q. So when you saw how much less it was, did you  
6 start thinking like that's going to be one less staff  
7 person or, you know, did you already have any ideas of  
8 what it was going to limit you from being able to do?

9 A. I did -- I looked at it and, yes, I worry that  
10 it will limit me what I will -- or have to not have  
11 staff. But I also know that if it comes down to it,  
12 the school systems would help meet the gap.

13 Q. How would they do that?

14 A. Like, Bulloch County pays for a teacher. Some  
15 of the other school systems would put money in for that  
16 to help.

17 Q. And do you know why your budget is lower this  
18 year? Is it because of the declining enrollment or  
19 some other cause?

20 A. Yes, because of declining enrollment.

21 Q. Is there any other recurring source of funds  
22 besides the annual GNETS grant?

23 A. No. Well, we get the annual state grant, and  
24 then we get a federal allotment also.

25 Q. What's the federal allotment?

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1 A. So it had been in the past \$315,000. But  
2 because our numbers have dropped below 100, now it is  
3 \$285,000.

4 Q. And is that for something in particular or  
5 also discretionary spending?

6 A. It's for discretionary spending. Most of that  
7 goes to pay for classified salaries.

8 Q. What's classified salaries?

9 A. Classified staff. Paraprofessionals, case  
10 managers, staff that don't have teaching certificates  
11 and contracts, noncontracted people.

12 Q. And is that the same pool of money you said  
13 the Why Try came from, that federal grant?

14 A. Yes.

15 Q. Is there any limitation on what you can use  
16 the state grant versus the annual grant for?

17 A. Versus the federal grant?

18 Q. I'm sorry, yes.

19 A. There are -- yes, there are things that you  
20 can use it for. I usually have to pull my notebook out  
21 every year when I sit down to do the budget to look at  
22 it.

23 Q. So you can't just put it all in one big bucket  
24 and pay the bills. You have to keep track of this is  
25 for some and this is for --

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1 A. Yes.

2 Q. Okay. Have you always received facilities  
3 grants from the state?

4 A. No.

5 Q. Would you be aware if the LEA had received  
6 facilities grants to do work on the facilities?

7 A. I believe the Bulloch County schools did.

8 Q. Are you involved in that process at all?

9 A. Not really, no. When they -- not the money  
10 process. When Bulloch County schools got the  
11 facilities grant to upgrade our building there, I  
12 consulted with the architect on some of the things that  
13 we would like to have done and that needed to be done.  
14 But I had no -- no monetary say.

15 Q. So you didn't have input into the amount you  
16 needed but just what your priorities would be on how to  
17 use the money that was given?

18 A. Yes.

19 Q. What did you recommend when you said you spoke  
20 with the architect about what you'd like to have  
21 done?

22 A. Well, we just talked about really the way the  
23 office space would be divided up. And our site was not  
24 ADA compliant prior. There was some stairs and there  
25 was no ramp, so we had to put a ramp in. We had

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1 conversations about the restrooms, where to put white  
2 boards and smart boards and that kind of thing.

3 Q. You're back now. I heard you up through not  
4 ADA compliant.

5 A. I'm sorry. So we were not ADA compliant so  
6 they had to put a ramp in because we had five stairs.  
7 And so in order to bring it up to compliance, they had  
8 to put a ramp in.

9 And so our discussions were around where the  
10 ramp would be and what it needed to have. We also  
11 talked about restrooms, where to put smart boards and  
12 the electrical for that.

13 Q. And were the requests that you made, were  
14 those the things that were, in fact, repaired with the  
15 facilities grant money?

16 A. Yeah. The entire building was pretty much  
17 gutted and rebuilt.

18 Q. When was that?

19 A. About three years ago, I think. I'm not good  
20 then with time progression either, so three or four  
21 years ago.

22 Q. And that would be the Statesboro site, right,  
23 because you were in Bulloch County?

24 A. Yes, the Statesboro site. I'm sorry.

25 Q. No, that's fine. I just wanted to clarify for

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1 the record. Okay. Have there been any other state or  
2 federal funds like COVID-related monies or special  
3 education-related funds?

4 A. Yes. Last year we got some COVID money for  
5 nursing-type supplies and things and then some money  
6 for counseling services.

7 Q. But that was only last year. It's not renewed  
8 this year?

9 A. It has not been renewed this year, no. Well,  
10 no, I'm sorry. Yes, there is a separate counseling  
11 grant that is coming from the Georgia Department of  
12 Education that was renewed this year. Yes.

13 I also get -- I'm sorry -- I also get money  
14 that I didn't think about for Dr. Mullis, our  
15 counselor. We receive a separate DOE grant for his  
16 salary, but I cover his benefits.

17 Q. And is the DOE grant for Mr. Mullis, that is  
18 recurring?

19 A. It has been, yes, for three or four years.

20 Q. But the other one, the counseling grant from  
21 Georgia Department of Education, do you understand that  
22 to be a one-time only like COVID?

23 A. I believe that it's for three years. I'm not  
24 completely certain.

25 Q. And then any other kind of funding? Do you

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1 get any kind of support or donations from LEA, from  
2 staff, from community partners, or families?

3 A. I get, like we already talked about, the  
4 salary and benefits for Cody Brannen. And then Appling  
5 County Schools gives me \$10,000 a year to offset the  
6 cost of a paraprofessional.

7 Jeff Davis County Schools gives me \$10,000 a  
8 year to offset the cost for a paraprofessional. And  
9 Evans County Schools gives me \$5,000 a year to help  
10 with a cost for a paraprofessional.

11 Tattnall County Schools provides a one-on-one  
12 paraprofessional for one of their students that is in  
13 his IEP that he needs an individualized  
14 paraprofessional, so they provide that parapro.

15 Q. Do they actually provide the parapro or  
16 provide the funding for the parapro?

17 A. They actually provide the parapro.

18 Q. Okay. And those amounts, is that LEA decides  
19 or signs an agreement or is it based on some kind of  
20 formula for how many students they have?

21 A. I don't know how the number came up. It's  
22 just been something that kind of was grandfathered in  
23 and continued. I've asked them each year, you know,  
24 are you going to be able to continue to do this. And  
25 they do and they have but...

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1 Q. What is S-W-I-S?

2 A. That's SWIS. We don't use that.

3 Q. Okay. Is it the school-wide information  
4 system?

5 A. Yes. That is a system that some GNETS and  
6 some school systems use for conduct citations or to  
7 track conduct and what is known as write-ups.

8 Q. Okay.

9 A. We do that through educator's handbook.

10 Q. And then I want to talk a little bit about the  
11 strategic plan and the self-assessment reviews. Are  
12 you familiar with the GNETS strategic plan?

13 A. Yes, I am.

14 Q. How would you describe what that plan is?

15 A. It's a plan that covers -- it used to be seven  
16 areas. I think it's now six areas -- to basically keep  
17 us on track where we look at it and grade ourselves and  
18 collect data to make sure we're doing the things we  
19 need to do.

20 Q. And who wrote the plan?

21 A. I believe the plan was written by some folks  
22 at the Georgia Department of Education and different  
23 GNETS directors. We're on a committee.

24 Q. When was it first written?

25 A. I don't know for certain, but it was when

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1     Nakeba was the program manager at the Georgia  
2     Department of Education.

3           Q.     And were you involved in that committee  
4     process?

5           A.     I was not on one of the committees for the  
6     initial one. I was on a committee when we had some  
7     discussions about what to combine and what to cut out  
8     to make it a little more streamlined.

9           Q.     Was that in connection with it used to be  
10    seven areas now it's six?

11          A.     Part of it, yes.

12          Q.     So what was the -- what were the areas that  
13    were combined and streamlined?

14          A.     I'm not certain. Off the top of my head, I  
15    don't know. If I had it in front of me, I could tell  
16    you.

17          Q.     What was the timeline, you would say, that  
18    your participation on this level, you know, this part  
19    of the process was?

20          A.     We probably worked on it for a few months, had  
21    a couple of meetings.

22          Q.     And how long ago was that?

23          A.     Prior to COVID. So when we look at things and  
24    I can track it like that, so it may have been 2018 and  
25    it could have been 2017.



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1 Q. Is that around the time the GNETS rule was  
2 being revised? Do you remember in working on the  
3 strategic plan, was it in connection with the GNETS  
4 rule?

5 A. I believe the rule had already been done.

6 Q. Okay. And what is the -- so you said it was  
7 designed to keep you on track. How does it work? What  
8 does the plan ask for GNETS or GNETS directors to do?

9 A. We collect data and evidence for each of the  
10 areas and the subareas. It requires GNETS directors  
11 to --

12 Q. What do you do with the data and evidence?

13 A. I've got it on a file on my computer.

14 Q. Oh, no.

15 A. We present it to our staff so they understand  
16 some of the task that they need to do and provide for  
17 us.

18 Oh, I completely lost her. My screen is gone.

19 THE VIDEOGRAPHER: We're off the record at  
20 4:52.

21 (Recess.)

22 THE VIDEOGRAPHER: We are back on the record  
23 at 4:53.

24 BY MS. TAYLOE:

25 Q. Okay. You were starting to tell us that the

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1 process involves collecting data and evidence for each  
2 of the areas.

3 A. Right. And part of that is ensuring that our  
4 staff knows what our goals are and turns in the things  
5 they need to turn in and they are staying on track in  
6 providing that information.

7 Q. And by what -- and what standard do you  
8 measure whether you're meeting the goals and achieving  
9 the objectives outlined?

10 A. So each one has the standard listed and then  
11 you write yourself as a -- well, as a 01 or 2, but I  
12 think changed that now.

13 Part of the change was that it's emerging or  
14 operational or nonexistent. And so that's how those  
15 are then marked based on the way that each of the  
16 subareas are listed. You know, there's a lot to it in  
17 each different section.

18 Q. And are directors given guidance as to what  
19 counts as emergent or operational?

20 A. In the beginning rollout of it, yes, we  
21 were.

22 Q. But not since then?

23 A. When it was adjusted and changed a little bit,  
24 then yes. But not to the same extent as at the  
25 beginning of the rollout.

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1 Q. Okay. And what is your understanding about  
2 how this information is used when you turn in your  
3 self-assessments?

4 A. I don't know how it's used.

5 Q. Do you ever get feedback after you've turned  
6 it in?

7 A. In the beginning when it was first rolled out,  
8 it was done where someone from the DOE came around to  
9 each GNETS and looked at all of the stuff that you had  
10 and rated each area.

11 But then beyond that, now they don't -- the  
12 DOE is not doing that. We rate ourselves and I've not  
13 turned it in. It's just something that we now just  
14 use.

15 Q. So, I'm sorry, you're not doing or you're  
16 doing it but not reporting it?

17 A. I'm doing it but not reporting it.

18 Q. Okay. And do you recall filling out or  
19 writing some narrative responses in response to the  
20 documents subpoena where you just described maybe why  
21 some information was not available?

22 A. Yes.

23 Q. Do you remember saying that you had not done  
24 the strategic plan for FY20 and FY21 because you were  
25 not scheduled for review?

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1 A. Yes.

2 Q. So I'm confused now. If I -- you said you  
3 were doing it but not turning it in. But that's how  
4 you were doing it unless I'm confusing two documents?

5 A. Okay. Well, I collected all the data. I had  
6 all the data collected that needs to be done, but we  
7 did not do the form and the rating.

8 I was -- it was a mistake on my part because  
9 when I found out that we weren't being rated and they  
10 weren't coming around -- the DOE was going to do a  
11 rotation of coming around.

12 And so when I found out that we weren't being  
13 in that rotation, I had all the data but we just didn't  
14 do the scoring. It was a mistake on my part. I didn't  
15 realize I was still supposed to score myself.

16 Q. So what did you do with the data you collected  
17 then?

18 A. It is in a file on my computer.

19 Q. Okay. So did you take any steps to, you know,  
20 make things operational that were emerging or anything  
21 like that?

22 A. Yeah. I mean, we still used it, you know, in  
23 looking at what data we had and where we needed to work  
24 on.

25 Q. So you still used it for internal purposes.

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1 You just didn't write up that formal?

2 A. Yes.

3 Q. When was the last time the Department of  
4 Education did come out and do a visit?

5 A. I don't remember. 2017, '18 maybe. I'm  
6 really not certain.

7 Q. And what were your ratings at the time, the  
8 program ratings at the time?

9 A. Our program ratings were pretty strong.

10 Q. Everything was operational or --

11 A. I can't completely -- I don't remember exactly  
12 what it was, but a majority of the things would have  
13 been operational.

14 Q. Did you get feedback from the Department of  
15 Education, the Georgia Department of Education, about  
16 steps to, you know, improve other things that weren't  
17 operational?

18 A. I don't recall.

19 Q. So do you know what the process is if a GNETS  
20 program identifies a deficiency or identifies an area  
21 in which it's emerging or not existent? Is there a  
22 process for recommended improvements?

23 A. Not that I know of.

24 Q. Is there any further checkups to see whether  
25 identified steps have been taken?

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1 A. I don't know.

2 Q. So it would be -- do you think it would be  
3 possible for a GNETS program to turn in a report that  
4 indicated a number of deficiencies and no action would  
5 be taken?

6 A. Thankfully, I've not been in that position so  
7 I don't know.

8 Q. What were the goals of the strategic plan  
9 committee that you were on?

10 A. To better define what needed to be collected  
11 and to look at what could be combined so there wasn't  
12 so much documentation that needed to be collected.

13 Q. To ease the reporting burden on the programs?

14 A. Say that again.

15 Q. To ease the reporting burden on the programs?

16 A. Yes, and just the collection burden.

17 Q. Okay. And in order to reach that goal, did  
18 you need to know what the Department of Education was  
19 going to do with the information that was collected so  
20 you could know what was not necessary or streamline  
21 it?

22 A. We didn't know that, so I don't know.

23 Q. So the committee made recommendations about  
24 what didn't need to be collected without knowing what  
25 was going to be done with the data that was

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1 submitted?

2 A. Yes.

3 Q. Okay. We focused a lot on the therapeutic  
4 support and services provided to the students in your  
5 program. And I want to give you a chance to be able to  
6 talk about what they can do and what they're good at  
7 because I know educators always like to have that  
8 opportunity.

9 So just tell me more about some of the things  
10 your students at your program can do.

11 A. Like what?

12 Q. Do they make friends with each other?

13 A. Some of them do. Some of them have  
14 socialization deficits. But in working with that,  
15 there are some of the students that are friends with  
16 each other, yes.

17 Q. Do they make each other laugh?

18 A. Some of them are quite entertaining, yes.

19 Q. Do they work hard at trying to meet their  
20 goals?

21 A. We have some students that are very focused on  
22 that. Some not so much.

23 Q. Like all groups of children?

24 A. Oh, absolutely, yes.

25 Q. When they are with children without

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1 disabilities, could they have meaningful interaction  
2 with their peers?

3 A. I would say sometimes, yes. I don't have the  
4 opportunity to see them with nondisabled peers, so I  
5 don't know the answer in general.

6 Q. What do you hear about when they do go to  
7 their classes in the LEA or when they did participate  
8 in extracurriculars with the ROTC with their peers?

9 A. There have been students that have been very  
10 successful in that, others that needed a lot of support  
11 and help, a lot of helping the staff at the LEA to  
12 understand what they needed. It just really depended  
13 on situations.

14 Q. In your experience when students leave  
15 Cedarwood, what is the most common next placement or  
16 what are the most common next placements?

17 A. They would commonly move into a special ed  
18 classroom or a special ed supported classroom at their  
19 home school or -- we really in trying to place students  
20 work to their strengths.

21 So if they are strong in math, we would try to  
22 put them in a math class so that they can be  
23 successful. It varies student to student.

24 Q. What are the biggest obstacles to students  
25 returning to a general education setting?



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1           A.     This is going to be my opinion of it. I don't  
2     have anything to back it up.

3                 But in general it is to -- the biggest  
4     obstacles are helping the teachers in the general  
5     education setting understand where the behaviors are  
6     coming from and that a behavior intervention plan is  
7     not necessarily to change a student but it changes the  
8     teacher's behavioral with them, with the student.

9                 So that's like an important part that students  
10    have to be dealt with and deal with in understanding  
11    their behaviors in a different way than -- you can't  
12    treat every student the same. And so that's a big  
13    issue when students go back.

14            Q.     And what do you think access to educational  
15    and therapeutic services for the population of students  
16    served in GNETS, how can they be improved?

17            A.     We would -- if this is a wish list thing, too,  
18    if we could have access to more certified staff, that  
19    would be an improvement. I would rather not have my  
20    high school students on E2020 or Edgenuity.

21                 I would love to have a high school science  
22    teacher that could teach the special ed students and  
23    have that person on staff.

24                 But the reality is, is that students that are  
25    in special, and not in special ed, in the school

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1 systems that we serve, their high school special ed  
2 students are on E2020 or that Apex program.

3 Also, because you can't find the teachers to  
4 teach it face-to-face. I would like to have more  
5 therapeutic staff.

6 Q. More in number or more different kinds of  
7 skill sets?

8 A. Both.

9 Q. What kind of skill sets would be missing?

10 A. To have like an art therapist to be able to  
11 come in. But we're in a rural area, and so even  
12 finding those things, to find a BCBA to come in and to  
13 work with us, I had a difficult time finding a  
14 counselor to come in and work with us.

15 Q. Okay. Can we have one more line of  
16 questioning? Can we take a five-minute break so I can  
17 check on my colleagues to see about any other questions  
18 before we wrap up.

19 A. Sure.

20 THE VIDEOGRAPHER: Off the record at 5:12.

21 (Recess.)

22 THE VIDEOGRAPHER: We are back on the record  
23 at 5:22.

24 BY MS. TAYLOE:

25 Q. Two questions to kind of clean up questions

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1 from before.

2 Are there -- does Cedarwood keep records of  
3 each consultation provided to an LEA for students that  
4 are back in their LEA.

5 A. We keep notes but no real records of it.

6 Q. Notes. What do the notes include?

7 A. Just a brief summary as to what was done  
8 or like it could have been -- and it doesn't even  
9 necessarily include content or like made a visit to XYZ  
10 school and met with XYZ teacher.

11 Q. It doesn't necessarily include that?

12 A. It would include that, but it may not include  
13 what was said or what was done necessarily.

14 Q. Okay. And would it include information about  
15 how long was spent there?

16 A. Not usually. It could, but I don't think that  
17 that is generally in that.

18 Q. Okay. And where would those notes be  
19 maintained?

20 A. In the past, they were just maintained by the  
21 person who did it. Now, we have it in like a Google  
22 Drive.

23 Q. So it used to not be centrally stored but now  
24 it's in a Google Drive?

25 A. Yes.

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1 Q. Okay. One other question I wanted to revisit  
2 is, is time in GNETS, like number of years a student  
3 has spent in the GNETS, is that something that was  
4 considered as part of the strategic plan?

5 A. No.

6 Q. That was not a target they wanted to reduce as  
7 part of the tracking the progress of the programs?

8 A. No.

9 Q. Was there any request that you track exit  
10 rates?

11 A. I don't think so.

12 Q. But if you did still track exit rates, either  
13 for that or for some other purpose, could that mask  
14 that some students were coming and going while others  
15 were staying for a long time?

16 A. Could that do what? I'm sorry.

17 Q. Like an exit rate might not look alarming but  
18 it would not reveal if some students were coming and  
19 going where others were staying for a long time?

20 A. I don't think that we keep that data.

21 Q. Okay. All right. I want to talk a little bit  
22 more about the facility closures that we talked about  
23 earlier. I don't know that you had dates but -- okay.  
24 So the Baxley site in Appling County was closed; is  
25 that correct?

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1 A. Yes.

2 Q. Do you remember what the facility's report  
3 said about that facility?

4 A. I don't remember.

5 Q. Did you ever see the facility's report  
6 itself?

7 A. I did, yes.

8 Q. Do you recall it mentioning the building had  
9 been built in 1954 with no apparent renovations?

10 A. I don't remember any of the content.

11 Q. Okay. Do you remember that it was one of the  
12 first facilities closed by the Department of Education  
13 even while the assessments were going on?

14 A. No. I don't recall that being what  
15 happened.

16 Q. What do you recall?

17 A. I recall that an email or a phone call was  
18 sent out that we were to be on a virtual meeting, all  
19 GNETS directors, and that -- or maybe it was just an  
20 email and a phone conference.

21 But it was announced which GNETS facilities  
22 would be closed. And I remember my heart racing and  
23 trying to figure out what we were going to do.

24 Q. Oh, because you learned on that call that --

25 A. On that call at that point in time everyone at

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1 the same time.

2 Q. And what did you do with the students from the  
3 Baxley site?

4 A. The students from the Baxley site were then  
5 going to be bussed to the Lyons site. And the Lyons  
6 site was moving to the current building that we're  
7 in.

8 Q. And what were these assessment reports for the  
9 Statesboro and Lyons sites?

10 A. I know the Lyons site was closed. I don't  
11 really remember the content of it. And I know that  
12 there were recommendations for the Statesboro site, but  
13 it was not closed. I received the reports.

14 Q. And do you remember what the basis for the  
15 closures were?

16 A. I don't remember the basis.

17 Q. Okay. And for the ones that weren't closed,  
18 what was -- what happened?

19 A. For the ones that --

20 Q. That were not closed. What did the Department  
21 of Education tell you about the ones that were not  
22 closed?

23 A. That would have been our Statesboro site, and  
24 they gave recommendations for it to be upgraded and  
25 things that needed to be done, which was then why

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1 Bulloch County applied for that GNETS facilities grant  
2 and redid the building.

3 Q. Do you remember were you involved in that  
4 process?

5 A. I was involved in the renovation of the  
6 building, yes. We talked about that earlier.

7 Q. Okay. So after the grant had been awarded,  
8 you were involved in how to spend the money but not in  
9 the part before that?

10 A. Actually, the application for the grant, the  
11 special ed director of Bulloch County schools did the  
12 application for the grant. And she asked me questions  
13 and I provided her with some information, but she did  
14 the bulk of the work on that.

15 Q. And during the period of the renovations, did  
16 students have to move to a temporary site for some  
17 period?

18 A. Yes.

19 Q. Where did they move?

20 A. They moved to another school in Bulloch County  
21 called Portal Middle High School, and we were given  
22 rooms in that school.

23 Q. I'm going to introduce now as Exhibit 259 a  
24 document from the State, GA00337565.

25 (Plaintiff Exhibit 259 marked.)

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1 THE WITNESS: Okay.

2 BY MS. TAYLOE:

3 Q. Do you recognize this document?

4 A. Yes.

5 Q. So for the record it's an email from Whitney  
6 Braddock to Vicky Cleveland on December 10, 2018.

7 Do you see where it says, "The parents in the  
8 area that our classes will be served this next semester  
9 did not want GNETS students in their building. They  
10 were under the impression that we were in a separate  
11 site because our kids were dangerous."

12 A. Yes.

13 Q. Can you tell me how you came to know that is  
14 what the parents' reaction was?

15 A. That, I was told that -- I don't know by  
16 whom -- after parents made an appearance at a Bulloch  
17 County school board meeting.

18 Q. And were they opposing the relocation, the  
19 temporary location of the GNETS students?

20 A. Yes.

21 Q. Was that kind of the concern you had heard  
22 before?

23 A. About the students being moved to Portal or  
24 just in general?

25 Q. No. In general about people having an



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1 impression about GNETS students in general.

2 A. Yes, I've heard that before.

3 Q. Why do you think that is -- or, I'm sorry --  
4 what have you heard before?

5 A. People are under the impression that GNETS  
6 students are alternative school students or that  
7 they're dangerous, that GNETS students are bad.

8 Q. Why do you think they have that impression?

9 A. I think that they have that impression because  
10 of gossip and talk that prior to some students being  
11 placed in GNETS. They have seen the students  
12 misbehavior, and they don't understand what's going on  
13 with the students.

14 And what I -- in this email talking about  
15 Portal, Portal is a small, very-closed community, very  
16 rural, and they know the kids and the people who are  
17 there. And they have known some students that are from  
18 Portal that have come to Cedarwood, and that is their  
19 opinion of those children.

20 Q. Do you think the fact that the students are  
21 educated in a separate building that was vacated by  
22 students moving to a new building, do you think that  
23 kind of environment could contribute to that  
24 impression?

25 A. I think that that impression more comes from

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1 what parents or teachers or other students report about  
2 these students when they're at these schools.

3 Q. Did the GNETS students, in fact, attend the  
4 Portal schools for that semester?

5 A. Yes.

6 Q. Was there any issue with them being dangerous  
7 during that time?

8 A. There was some behavior issues, but there was  
9 no issues with them being dangerous.

10 Q. Were your staff able to provide the services  
11 in the Portal schools?

12 A. Yes.

13 Q. And then who decided that that placement would  
14 be temporary?

15 A. The Bulloch County superintendent.

16 Q. And why -- is that a man or woman?

17 A. A man. Charles Wilson is his name.

18 Q. Why did he get to decide that?

19 A. Well, Bulloch County Schools applied for the  
20 facilities grant, and Bulloch County schools made --  
21 put in other local funding to redo the building.

22 And in doing that, he needed a place -- Portal  
23 Middle High had the rooms for us to move to but then  
24 the money was being spent to upgrade the building. So  
25 then when the building was completed, then we moved

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1 back into it.

2 Q. Were you aware that the facility's grant  
3 application had a provision that the grant recipients  
4 had to promise that the GNETS program would stay in the  
5 facility for ten years?

6 A. Yes.

7 Q. Was that ever discussed with you?

8 A. No, not really. I don't recall having a  
9 discussion with anyone about it that I can think of.

10 Q. And are you aware of the amounts of money that  
11 were spent on the renovation?

12 A. I do not know the exact price of it. I'm not  
13 certain of what it was.

14 Q. I'm going to mark as Exhibit 260 document  
15 GA04103131 and let you have control of it.

16 Ms. Braddock.

17 A. Okay.

18 (Plaintiff Exhibit 260 marked.)

19 (Witness reviewing document.)

20 THE WITNESS: Okay.

21 BY MS. TAYLOE:

22 Q. So I'm going to state for the record this is  
23 an email from Troy Brown to Pat Schofill copying Scott  
24 Wilson dated April 11, 2019.

25 And do you see that the award amount -- well,

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1 the total project cost was \$1,026,884.

2 A. Yes.

3 Q. And do you see that the state portion of that  
4 was over \$807,000?

5 A. Yes.

6 Q. And do you see that the local contribution --  
7 let me back up and explain a little bit.

8 Do you understand that the GNETS grant had a  
9 matching requirement that the LEA had to match part of  
10 the funds awarded by the grant?

11 A. I think that I knew that.

12 Q. Okay. And do you see here in this letter that  
13 it said the local portion of the project cost had  
14 increased from over \$200,000 to nearly \$500,000?

15 A. Yes.

16 Q. So what I'm wondering about is whether you  
17 would have -- what are your thoughts about the wisdom  
18 of spending a million dollars to repair a building for  
19 the use of 60 students with a declining enrollment when  
20 they were being moved out of a facility that had  
21 available space in a general education in which you  
22 said that the students were receiving services  
23 successfully?

24 A. I don't know that I have an opinion on it.

25 Q. Do you think you can think of other uses for

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1 the money. You had a wish list of things you would  
2 like to be able to offer for your students that some of  
3 that money might have been able to go to?

4 A. You know, if you gave me over a million  
5 dollars, I could spend it.

6 Q. And you were not consulted. I'm trying to  
7 remember. So you were not consulted about any of that  
8 except for the content of the renovations to be made to  
9 the building after the grant was awarded?

10 A. Yeah. Like I said, Leslie Schlierf put in for  
11 the grant. And she asked me some questions, and I  
12 helped her get some data, but that was the extent of my  
13 involvement.

14 Q. Okay. And I think unless my colleagues want  
15 to shoot me an email or something, I think I'm about  
16 done.

17 MR. NGUYEN: Why don't we do this, Laura.  
18 You've got technically 11 minutes left apparently. So  
19 why don't we let Danielle go ahead and ask. And then  
20 if you guys got any follow-up, people will text you or  
21 something.

22 MS. TAYLOE: Okay.

23 MR. NGUYEN: Does that work?

24 MS. TAYLOE: That works with me if it's okay  
25 with Danielle. I don't know if she --

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1 MR. NGUYEN: Are you ready? I saw you jump on  
2 the screen so I didn't know if you were ready.

3 MS. HERNANDEZ: Yeah, I'd rather -- if Laura  
4 is going to need her 11 minutes, I'd rather wait out  
5 the 11 minutes. I don't want to have my questioning  
6 and then her follow up afterwards.

7 MR. NGUYEN: Okay.

8 MS. TAYLOE: Well, Kelly is right there.

9 Kelly, do you want me to wait for an email or  
10 are you finished?

11 MS. GARDNER: No. I don't have anything.

12 MS. TAYLOE: Okay. I don't have any other  
13 emails, so I'm ready to gift the last 11 minutes.

14 THE WITNESS: I was going to tell you if you  
15 make Kelly say something, she knows that she's sitting  
16 in this room with us and she might be in trouble. I do  
17 know how to restrain.

18 MS. TAYLOE: Thank you for your time,  
19 Ms. Braddock -- sorry, Danielle, I just wanted to thank  
20 you for your time.

21 MS. HERNANDEZ: No worries.

22 EXAMINATION

23 BY MS. HERNANDEZ:

24 Q. Hi, Ms. Braddock. I also want to thank you  
25 for your time. Thank you for being here today. My

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1 name is Danielle Hernandez. As I said earlier, I  
2 represent the State of Georgia.

3 I just wanted to note for the record that this  
4 deposition has been cross-noticed by the State of  
5 Georgia and it is occurring immediately after the  
6 deposition that was just taken by the Department of  
7 Justice.

8 With that being said, I just want to say that  
9 we're going to go use the same rules of deposition that  
10 were discussed earlier by the Department of Justice.  
11 For example, if I'm asking a question, just let me  
12 finish the question. If you need a break, so forth and  
13 so on.

14 So I have a very small amount of questions, so  
15 I'm just going to get to it and hopefully we can end  
16 this soon.

17 When a maintenance request needs to be made at  
18 either the Lyons location or the Statesboro location,  
19 who is the maintenance request made to?

20 A. The school system that the location is housed  
21 in.

22 Q. Okay. And does the county decide what vendor  
23 will come out and make any maintenance repairs? Do you  
24 know how that process occurs?

25 A. I don't know how that process occurs, but I do

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1 know that in Bulloch County they have a large, pretty  
2 large maintenance department and most of the  
3 maintenance is done by them.

4 I think any time that I've seen it with the  
5 exception of a broken window, and a glass company has  
6 come out to change that.

7 Q. Okay. Do you know who handles the technical  
8 issues that happen at either the Lyons or Statesboro  
9 location?

10 A. We receive technical help from each of the  
11 school systems, the Toombs County school system and the  
12 Bulloch County school system. Also, I receive some  
13 technical assistance from the technology department  
14 here at First District RESA.

15 Q. Okay. And do you know who pays or who writes  
16 the checks for the maintenance staff and the technical  
17 staff?

18 A. Each school system does, to my knowledge.

19 Q. Okay. Now I just kind of want to switch over  
20 to IEPs. Who makes up an IEP team? Like, who are the  
21 individuals that make up an IEP team?

22 A. Specific to GNETS or Cedarwood?

23 Q. Yeah.

24 A. Okay. So it is our coordinator, a teacher  
25 from Cedarwood, usually whatever school is the home



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1 school for the student, their special ed supervisor  
2 there, parents, students sometimes, possibly a teacher  
3 at the school, the home school, would sit in.  
4 Sometimes I would sit in if I need to, special ed  
5 director. That's about it.

6 Q. So is there ever a member of the state on an  
7 IEP team?

8 A. Is there a what?

9 Q. Ever a member of the state on the -- on an IEP  
10 team?

11 A. No. We've not ever had a member of the state  
12 on an IEP team.

13 Q. Okay. Are you aware of any instance in which  
14 the state participated in a decision for a student to  
15 receive GNETS services?

16 A. No.

17 Q. Okay. I have two more questions for you.  
18 Give me one second. Let me just look through my notes.

19 Are you aware of any instances in which the  
20 case compelled Cedarwood GNETS program to make a  
21 particular decision regarding a student's placement?

22 A. No.

23 Q. Okay. Has the state ever encouraged you to  
24 keep a student in GNETS when their IEP recommended  
25 otherwise?

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1 A. No.

2 Q. All right. That's it. No further questions.

3 Thank you so much for your time today.

4 A. Thank you.

5 MS. TAYLOE: Thank you, everybody.

6 THE VIDEOGRAPHER: No further questions, this  
7 concludes the deposition of Director Whitney Braddock.  
8 We are off the record at 5:49.

9 THE REPORTER: Can I have the transcript  
10 orders on the record, Counsel?

11 MS. HERNANDEZ: The State would like to  
12 request an electronic transcript.

13 THE REPORTER: And I know, Ms. Tayloe, you  
14 have a standing order so I'm not going to ask.

15 MS. HERNANDEZ: Can the State also request a  
16 mini transcript?

17 THE REPORTER: Sure.

18 MR. NGUYEN: I don't need a transcript at this  
19 time, but I can request it later if I need to.

20 THE REPORTER: Yes. Thank you.

21 (Signature reserved.)

22 (Deposition concluded at 5:50 p.m.)

23

24

25

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REPORTER DISCLOSURES

The following representations and disclosures are made in compliance with Georgia Law, more specifically:

Article 10(B) of the Rules and Regulations of the Board of Court Reporting (disclosure forms).

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I am a certified court reporter in the State of Georgia. I am a subcontractor for Esquire Deposition Solutions. I have been assigned to make a complete and accurate record of these proceedings.

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This 28th day of July 2022.

Deborah K. Lingonis, RPR, CCR 2883

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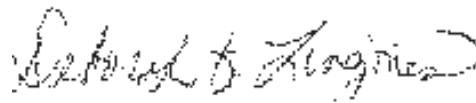
C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF CHATHAM:

I hereby certify that the foregoing transcript was reported, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages represent a true, complete, and correct transcript of the evidence given upon said proceeding, and I further certify that I am not of kin or counsel to the parties in the case; am not in the employ of counsel for any of said parties; nor am I in any way interested in the result of said case.

This 28th day of July 2022.



Deborah K. Lingonis, RPR  
CCR 2883

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ESQUIRE ERRATA SHEET

Esquire Job ID: J8396290

Case Caption: USA v. State of GA

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my deposition taken in the above-captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on this \_\_\_\_\_ day of

\_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
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